PM_{10} SIP POINT AND AREA INVENTORY PROTOCOL

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PM₁₀ SIP POINT AND AREA INVENTORY PROTOCOL

1. INTRODUCTION

The State of Utah developed a SIP for PM₁₀ encompassing Salt Lake and Utah Counties in the early 1990's which was approved by the EPA in 1994. This SIP targeted Utah's historical problem with secondary particulate formation during wintertime inversions along the Wasatch Front, although the tools used at that time were inadequate for secondary particulate. During the time since the SIP was approved, ambient air monitoring data from a number of locations along the Wasatch Front have continued to be at or near the National Ambient Air Quality Standards (NAAQS).

Although there have been no violations of the NAAQS in the nonattainment areas since the current SIP was implemented, UDOT expects that the next round of long-range transportation plans and transportation improvement plans, due in 2000 for Utah County and 2001 for Salt Lake County, will not be able to show conformity to the PM_{10} SIP. Much of this nonconformity is the result of EPA changes to mobile emissions models that were used to establish emission budgets in the current SIP and mobile growth far greater than predicted at the time the SIP was developed. For these reasons the Utah Division of Air Quality (UDAQ) has decided to create an entirely new PM_{10} SIP. It is possible that the work product could turn out to be a Maintenance Plan, in which case the nonattainment areas could be redesignated to attainment.

An additional incentive for redoing the PM_{10} SIP is to fix elements of the current SIP which have created ongoing difficulties in implementation. When the existing SIP was developed, significant control strategies were implemented at most major point sources throughout the two nonattainment areas. This was done with point-specific emission limits, itemized in appendices to the SIP, and adopted into federal law. This creates an awkward situation when a source requests a revision to an approval order (Utah NSR permit) because until the change is approved by the EPA as a SIP revision, the source is subject to different State and Federal requirements.

A major consideration in redoing the PM_{10} SIP is that modeling tools have advanced in the years between the development of the current SIP in the late 1980's and today. The current SIP is based on dated receptor modeling and county-wide roll-back of PM_{10} , sulfur oxides (SO_2), and oxides of nitrogen (NO_x). For this new SIP/Maintenance Plan, UDAQ in consultation with the EPA Region VIII, has decided to take a two pronged approach to the attainment demonstration. This approach will consist of a grid-based aerosol modeling analysis using UAM-AERO and speciated linear rollback. The attainment/maintenance demonstration would be based on the results of one or both of these models.

The basis for the modeling process is the emissions inventory. This document explains the procedures the UDAQ will use to calculate 1996 base year emission estimates for area and point sources within the PM_{10} domain and the procedures for projecting future air pollution emissions.

This document is organized to be consistent with SIP Technical Support Documentation. This will enable easy, concurrent review of the protocol and the SIP TSD.

2. EMISSIONS DATA PREPARATION

The UDAQ has developed a 1996 annual inventory for the state. The annual point source inventory for Salt Lake and Davis Counties consists of data on sources that have emit 10 tons or more per year of VOC or 25 tons or more per year of NO_x. UDAQ has data on sources in Utah and Salt Lake Counties with 25 tons or more per year of PM₁₀ and SO_x. Inventory data has been gathered for Title V sources emitting 100 or more tons per year of NO_x, SO_x, carbon monoxide (CO), volatile organic compounds (VOC), PM₁₀ or 10 tons or more per year of a hazardous air pollutant (HAP) or 25 tons or more per year of a combination of HAPs, and major HAP sources; that are regulated under New Source Performance Standard (NSPS), National Emissions Standards for Hazardous Air Pollutants (NESHAP), and Maximum Achievable Control Technology (MACT) sources in other areas of the domain. This data will be used to develop winter day inputs for PM₁₀ emissions from the episode period spanning February 6 - 9 and 11-15, 1996.

PM₁₀ area and point source domain emissions will be calculated using methods outlined in EPA's current inventory development guidance, the "Emission Inventory Improvement Program (EIIP)", EPA-454/R-97-004a, July 1997, document unless otherwise indicated (See Table 1 in Section 5 of this document). This document is located on the EPA Web site - http://www.epa.gov/ttn/chief/eiip/techrep.htm#areasrc. The various methods for individual area source categories are outlined in Section 5, *Area Source Emissions Data* of this document.

References are made in this document to a software model called SMOKE¹, Sparse Matrix Operator Kernal Emission modeling system. This software will be used to apportion annual emissions to episode day in area categories. The exceptions to using SMOKE defaults occur when the situation in Utah varies from the assumptions used in the software. The main functions of SMOKE are to: import the inventory, spatially allocate emissions to a photochemical or aerosol modeling grid, temporally allocate emissions from an average day or annual average, speciate emissions for some chemical mechanism, and output emissions for an air quality model. SMOKE treats emissions calculations as vector-matrix algebraic calculations. With this approach, SMOKE sorts the inventory records, stores them, and assigns a unique line/record number for each source. This sorting configures the inventory so that efficient algorithms also can be used for other processing operations. The source characteristics are stored in one file and matched to records in other files using the unique line/record number for each source.

¹More information about SMOKE can be found on the website http://www.envpro.ncsc.org/products/smoke.

SMOKE has separate programs for each of the major processing steps (e.g. temporal, speciation, spatial allocation), and each processing step creates an intermediate data set which contains the conversion factors or new emissions required for all sources in the inventory for that step. SMOKE combines these separate emission calculation steps in a merge step, which can merge the various intermediate data sets in many combinations (e.g., gridded inventory, gridded hourly inventory, or gridded speciated inventory). The merge processor also provides state and county totals for the user.

SPATIAL ALLOCATION

SMOKE does not provide any capability to prepare spatial surrogates, which are needed for area sources, off network (HPMS) mobile sources, and some types of biogenic processing. These spatial surrogates must be developed outside of SMOKE. UDAQ has prepared spatial surrogates using ARC/INFO, a geographic information system, outside of the SMOKE modeling system. Spatial allocation of point source emissions is done within the SMOKE model

TEMPORAL PROCESSING

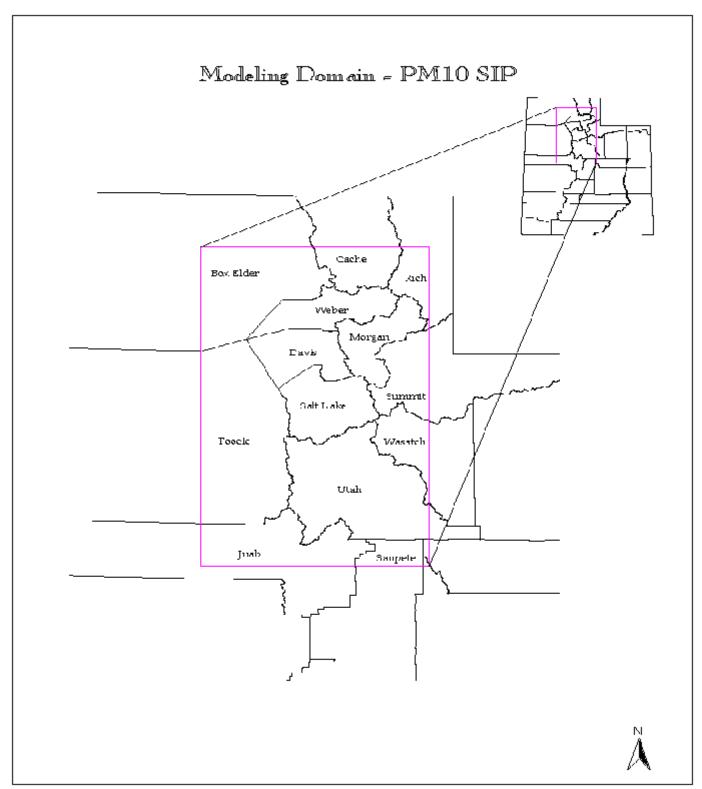
The temporal processing is done by adjusting emissions by month, day of week, and desegregating emissions from day to hour. SMOKE can also use day-specific and hour-specific point sources data.

CHEMICAL SPECIATION

Speciation is the application of chemical profiles to the inventory. For example; a profile might tell the model that for every kilogram of motor vehicle gasoline exhaust, the model should make 0.5 Moles of Carbon Bond IV species "aldehydes". These profile tables are usually applied based upon SCC codes. The model contains a table of profiles, which are applied through the use of cross reference files.

An ammonia inventory was not developed in 1996. However, ammonia data was requested from point sources in 1997 and 1998. This data will be used to complete an ammonia inventory of point sources. In addition, the 1996 Toxics Release Inventory (TRI) includes ammonia emissions for some processes at some sources. Where there are discrepancies between the emissions reported in the TRI and the emissions reported in the 1997/1998 inventories, sources will be contacted to determine the most accurate emission figures. resolve the conflicts. This data will be included in the ammonia inventory. The 1996 throughput (i.e. fuel burned in a boiler, sand used in a sand blaster, etc.) and emission factors from the "EPA Compilation of Air Pollutant Emission Factors", (AP-42) and "Development and Selection of Ammonia Emission Factors", EPA/600/R-94/190, August 1994, will be used to calculate the ammonia emissions. The area ammonia data will be calculated using the methods outlined in the Section 10, *Ammonia Sources*.

Projections of ammonia emissions shall be based on the surrogate growth rates, such as the projected increase in the number of livestock in the domain.



2/3/00 1_gs/PM10_SIP



3. PM₁₀ MODELING DOMAIN

The proposed emissions modeling domain consists of all or portions of Box Elder, Cache, Davis, Juab, Morgan, Rich, Salt Lake, Sanpete, Summit, Tooele, Utah, Wasatch, and Weber and Counties. A map of the area is shown on page 7. All but Salt Lake and Utah Counties and Ogden City are currently designated as attainment of the federal PM₁₀ standard.

4. DATA BASES

Base year 1996 emissions inventory for the study region will be developed from the basic annual 1996 emissions data set inventory compiled by the UDAQ in 1997. Since the area categories in the 1996 inventory were based on their impact on ozone and CO emissions for tracking emissions for ozone and CO SIPs, some dust sources were overlooked. These are being added to the annual and episode area inventories. UDAQ is applying rule effectiveness to point sources when appropriate. Rule effectiveness is a way of calculating additional emissions from point sources that have controls that do not operate at their full efficiency all of the time.

The data will be analyzed for any data holes or inaccurate assumptions. Needed actions will be prioritized and modifications will be made to improve the accuracy of the current data. The scope of this work will depend on available resources. Any potential actions will be are outlined in Section 12, *Future Actions* during the preparing of this document. Any modifications will be documented. The periodic inventories that have been submitted to EPA to track for CO and ozone will be reviewed to see if any episode day inventory changes affect the emissions reported in these annual inventories. have an impact on these submittals. Since new categories are being added to the area inventory and the required models used to calculate some types of emissions (i.e. MOBILE4/MOBILE5) have changed, the emission estimates may change in the annual inventory. There may be requirements in the existing ozone, CO, and PM₁₀ SIPs that will be triggered if emissions increase substantially. The exact actions will depend on the change in emissions and requirements in the SIPs. Actions that are needed due to any impacts will be negotiated with EPA.

5. AREA SOURCE EMISSIONS DATA

This section explains how emissions will be calculated for the area categories that will be included in the PM_{10} area source inventory. (See Table 1) Many of these categories were included in the UDAQ 1996 Statewide Annual Area Emissions Inventory during its development. Many of the methods used to calculate the annual area inventory categories are contained in the EIIP. UDAQ will continue to use these methods. However, some of the methods have been updated. In order to comply with the EPA guidance,

UDAQ will use methods outlined in EIIP for the area emission calculations unless otherwise specified in the following sections. The use of any method which deviates from the EIIP will be explained and submitted for EPA approval.

Some categories have been included in the EIIP that UDAQ has not previously incorporated into the area inventory. These will be added to the PM_{10} emission inventory. In addition, there are categories which UDAQ believes to be significant emitters of PM_{10} and PM_{10} precursors that are not included in EIIP. These categories are being added to this inventory.

TABLE 1
EMISSION CALCULATION METHODS

CATEGORY	METHOD
Gasoline Distribution	EIIP Chapter 11, Altered Preferred Method 1
Dry-cleaning	EIIP Chapter 4, Method 2
*Industrial Surface Coating	EIIP Chapter 8, Alternative Method 2
Solvent Cleaning	EIIP Chapter 6, Alternative Method
*Traffic Markings	EIIP Chapter 14, Method 2
Architectural Surface Coating	EIIP Chapter 3, Alternative Method
*Auto Body Refinishing	EIIP Chapter 13, Alternative Method 3
Graphic Arts	EIIP Chapter 7, Alternative Method 2
Asphalt	EIIP Chapter 17, Alternative Method 2
Commercial & Consumer Pesticide Applications	Not applicable to Episode day. Method for annual inventory is being determined.
Commercial/Consumer Solvent Use	EIIP Chapter 5, Per-capita method
Treatment, Storage, and Disposal Facilities (TSDFs)	Point sources
Industrial Wastewater Treatment	Point sources
**Publicly Owned Treatment Works (POTWs)	SIMS model
Municipal Landfills	Chapter 15 Preferred Method Landfill model

CATEGORY	METHOD
**Leaking Underground Storage Tanks (LUST)	Information from Division of Emergency Response and Remediation
Orchard Heaters	Not applicable
Woodburning/Fireplaces	EIIP Chapter 2 for episode day
Bakeries	EIIP Bakeries abstract
Residential and Commercial/Institutional Coal Combustion	EIIP Coal abstract
Natural Gas	EIIP Natural Gas abstract Preferred Method
Fuel Oil Combustion	EIIP Fuel Oil abstract Preferred Method
Breweries, Wineries, Distilleries	Not applicable
Catastrophic/Accidental Releases	Not applicable
Synthetic Organic Chemical Storage Tanks (SOCST)	Not applicable
Incineration	Point sources
**Forest Fires	Information from Division of State Lands and Forestry
**Firefighting Training	Not applicable
Structural Fires	EIIP Chapter 18 Alternative Method 2
Prescribed Burning/Slash Burning/Agricultural Burning	Not applicable in episode day inventory. Annual method for agricultural burning uses Department of Agricultural information.
Open Burning	Not applicable for episode day inventory. Annual method is yet to be determined.
Aircraft/Rocket Engine Firing and Testing	Point sources
Charcoal Grilling	Not applicable
* **Vehicle Fires	Information from Federal Emergency Management Agency.
Barge Cleaning	Not applicable

CATEGORY	METHOD
Chemical Tanks	Point sources
Tank Truck Cleaning	Not applicable for the episode inventory
Railcar Cleaning	Not applicable
Drum Cleaning	Not applicable for episode inventory

^{*} Category has been added to the existing 1996 inventory.

The point source inventory includes sources that have emissions from processes that are also included in the area inventory. In order to avoid double counting, all point source emission points were searched for Source Classification Codes (SCC) which may be included in area source categories. The list contains approximately 4,300 entries. This list was examined by individual SCC to determine if its reported emissions were double-counted in the area inventory. If so, the emissions were subtracted from the area inventory reducing the area source quantity. The emissions are reported in the point source inventory.

Since the PM_{10} modeling domain includes portions of some counties while excluding other portions of the same counties, a method was devised to rationally divide county wide totals for each polluting category. The emissions from each category are indexed to one of three distribution methods. Those methods are:

- (1) Distribution by facility location (IN-OUT),
- (2) Distribution by county land acreage (LAND), and
- (3) Distribution by county human population residency (POP).

These Area Source categories are indexed to one of these 3 distribution methods as follows:

IN-OUT: Landfills, Publicly-Owned Treatment Works (POTW), Treatment, Storage, and Disposal Facilities (TSDF), Industrial Waste Treatment, Catastrophic/Accidental Releases, Feed Lots, and Aircraft flights and their maintenance.

The activity of these categories are is linked to the actual location of each event or facility. When one of these sites falls inside the domain, all the emissions from that site are attributed to the domain. Conversely, when a site falls inside a given county but *outside* the domain, no emissions are assigned to that portion of that county that resided in the domain. For example, the location of each airport is identified and the activity and emission from each incoming and outgoing airplane is assigned to the GIS (Global Information System) grid squares that comprise the airport. Aircraft *maintenance* emissions are presumed to occur on, or very near, the airport property so these emissions are effectively located at the airport itself.

^{**}Category not included in the EIIP.

LAND: Accidental Releases, Agricultural Burning, Agricultural Crop Harvesting, Agricultural Land Preparation, Asphalt, Biogenics, Firefighter Training Fires, Leaking Underground Storage Tanks, Open Fires from Forest and Range Fires, Orchard Heaters, Pesticide Application, Railroad Activity, Road Construction, Traffic Markings, Unpaved Farm Roads, and Unpaved Non-farm Roads.

The activity surrogate for these categories are is closely linked to the total land area of each county falling inside the domain: presumed linear to the land available. For example, in calculating railroad activity a linear relationship is applied since *more* acreage requires *longer* rail track lines requiring *more* diesel fuel to move rail freight. The emissions from the diesel consumed by each railroad company in each county is retained on a county wide basis, then a simple land-area apportionment is used to distribute each county's railroad emissions to the area falling inside the domain's portion of that county. The distribution of *LAND* is determined by GIS (Global Information System) mapping. This mapping is completed (or managed) by Patrick Barickman of UDAQ.

POP: Dry-cleaning, Industrial and Architectural Surface Coatings, Solvent Cleaning, Auto Body Refinishing, Solvent Use, Tank Cleaning, Bakeries, Breweries, Charcoal Grilling. Wood, Coal, Oil, Natural Gas, Misc Non-Road Engines, and Structure and Vehicle Fires, Open Burning by Permit.

The activity of these categories are most-closely linked to the needs of people as they provide hot water and space-heating to their homes, maintain their homes, cars, and health, and use recreational equipment. The distribution of *POP* is determined by equation, as detailed below.

Pop IN = [[(Land IN
$$\times$$
 Balance) + known IN] / All Pop] x 100

Definition Of Terms in Equation:

Land IN, (%) = The percentage of each county that lies within the domain as measured by conventional GIS techniques. Interior counties are always 100% within the domain while border-counties are less than 100% because they are trimmed by the domain's boundary line. GIS results are as follows:

AREA IN DOMAIN				
	Total	Area in	% in	
County	Sq. Km.	Domain	Domain	
Box Elder	17456	3869	22%	
Cache	3040	1253	41%	
Carbon	3844	43	1%	
Davis	1644	1644	100%	
Emery	11546	17	0%	
Juab	8821	2794	32%	
Morgan	1581	1581	100%	
Rich	2812	808	29%	
Salt Lake	2086	2086	100%	
Sanpete	4147	660	16%	
Summit	4867	1552	32%	

Tooele	18871	5961	32%
Utah	5544	5150	93%
Wasatch	3129	1159	37%
Weber	1708	1708	100%

Known IN, (numeric value) = The number of people residing in all towns and cities that are <u>known to lie</u> <u>inside</u> the domain-portion of a given county. Populations are taken from the *U.S. Bureau Of The Census*, *Subcounty Population Estimates* for the year 1996, published June 30, 1999.

Known OUT, (numeric value) = The number of people, listed by census, of all towns and cities that are known to lie outside the domain-portion of a given county.

Balance, (numeric value) = The number of people, listed by census, residing in a given county that do not hold residency in any listed town or city of that county. These people are presumed to reside in the "unincorporated" areas of the county. Since no further easily-assessable information is known about their residency, they are presumed to reside uniformly over the entire county, some residing inside and some outside the domain. The following table lists the population of each town and city in the county and the number of people known to be in the domain area (**Known IN** area) followed by the **Balance** population.

1996 Population -Source: Governor's Office of Planning and Budget

Box Elder Cache				Jual	э		Sui	mmit			
Co	unty Total	40072	Соь	nty Total	84429	Сои	nty Total	7044	Co	unty Total	2448
*	Bear River City	800	*	Hyrum	5460	<u>*</u>	Eureka	630	<u>*</u>	Coalville	128
*	Brigham City	16764	*	Millville	1364	*	Mona	820	*	Francis	69
<u>*</u>	Corinne	681	*	Nibley	1480	*	Nephi	4252	*	Kamas	146 :
*	Deweyville	344	*	Paradise	711	SUB	TOTAL	5702	<u>*</u>	Oakley	84
*	Elwood	647	*	Wellsville _	2808		Levan	470	*	Park City	622
*	Honeyville	1243	SUE	TOTAL	11823	BAL	ANCE	872	SU	BTOTAL	1051
*	Mantua	684		Amalga	473					Henefer	67
*	Perry	1497		Clarkston	664				BA	LANCE _	1329
*	Willard	1470		Cornish	205	Mor	gan		Too	sele	
SU	BTOTAL	24130		Hyde Park	2693	Cou	nty Total	6798	Co	unty Total	3009
	Fielding	435		Lewiston	1546	*	Morgan	2420	*	Grantsville	519
	Garland	1798		Logan	39415	SUB	TOTAL	2420	*	Rush Valley	36
	Howell	268		Mendon	771	BAL	ANCE	4378	*	Stockton	46
	Plymouth	280		Newton	710				*	Tooele	1499
	Portage	221		North Lagon	5769				<u>*</u>	Vernon	19
	Snowville	267		Providence	4032	Rich	1		<u>*</u>	Wendover	119
	Tremonton	4786		Richmond	1991	Сои	nty Total	1852	SU	BTOTAL	2241
BA	LANCE _	7887		River Heights	1328	SUB	TOTAL	0		Ophir	3
				Smithfield	6820		Garden City	228	BA	LANCE _	764
				Trenton	468		Laketown	271	Wa	satch	
			BAL	ANCE	5721		Randolph	517	Co	unty Total	1228
							Woodruff	146	*	Charleston	42
						BAL	ANCE	690	*	Heber	540
lance = Population not in cities in entire county						<u>*</u>	Midway	217			
ubtotal = Population in cities in domain						*	Wallsburg _	31			
the domain					j	SU	BTOTAL	831			
								Ī	BA	LANCE	396

UAM-AERO DOMAIN
Apportionment By Population inside the modeling domain, 1996

Box Elder			Sanpete		
	All Pop	40,072		All Pop	20,165
	Known IN	32,185		Known IN	
	Balance	7,887		Balance	2,600
	Pop IN	84.68%		Pop IN	2.05%
Cache			Summit		
	All Pop	84,429		All Pop	24,488
	Known IN	78,708		Known IN	13,292
	Balance	5,721		Balance	11,196
	Pop IN	96.02%		Pop IN	63.03%
Davis	D 111	400.000/	Tooele	411.5	00.000
	Pop IN	100.00%		All Pop	30,096
				Known IN	22,447
Juab	A II D	7044		Balance	7,649
	All Pop	7,044		Pop IN	82.61%
	Known IN	5,542			
	Balance	1,502	Utah		
	Pop IN	82.60%		All Pop	321,199
				Known IN	11,952
Morgan				Balance	309,247
	All Pop	6,798		Pop IN	99.74%
	Known IN	6,798			
	Balance	0	Wasatch		
	Pop IN	100.00%		All Pop	12,283
5				Known IN	8,332
Rich				Balance	3,951
	All Pop	1,852	·	Pop IN	79.75%
	Known IN	1,162			
	Balance	690	Weber		
	Pop IN	73.45%		All Pop	179,459
				Known IN	179,459
Salt Lake				Balance	0
	All Pop	827,780		All Pop	100.00%
	Known IN	827,780			
	Balance	0			
	Pop IN	100.00%			

All Pop, (numeric value) = The total human population, listed by census, of any given county.

Pop IN, (%) = The percentage of people estimated to live inside the domain's portion of any given county. This is a calculated value using the above equation on page 13.

For counties interior to the domain, the **Land IN** is always 100%, therefore the total human population of its towns, cities, and unincorporated parts will always sum to the county's full population. Notice that **Known OUT**, the number of people known to reside in the county but outside the domain, is not listed within the equation, above.

Apportionment Of 1996 Winter Day Emissions

After the *annual* domain apportionment is complete, the typical winter day and the episode days apportionment will be calculated either by SMOKE or by UDAQ. The SMOKE preprocessor will apportion the annual emissions into typical winter day. UDAQ will use the defaults contained in SMOKE for all categories except for categories that do not fit the defaults within the software. These categories are indicated in the following sections.

Projecting area source emissions

The following basic equation will be used to project area sources:

Projection year emissions = (base year emissions) X (growth factor) X (control factor)

The base year emissions will be based on typical winter inversion day meteorology. The typical inversion day includes snow cover, cold temperatures, and fog. Explanations on how this effects the various category emissions are included in the area category sections.

The growth factors will be based on the growth indicators listed in the following Table 2EHP Volume 10 Table 13.1-1 with the exception of POTWs, gasoline marketing and municipal solid waste landfills. Population growth is used to project these emissions.

Human population and category-specific employment estimates, as reported by the *U.S. Bureau Of The Census*, *Subcounty Population Estimates* for the year 1996, will be used as the indicators for the growth factor in the projection equation.

TABLE 2
GROWTH INDICATORS FOR PROJECTING EMISSIONS FOR AREA SOURCE CATEGORIES

Source Category	Growth Indicators	Information Sources
Gasoline Marketing	projected gasoline consumption	MOBILE5 fuel consumption model
Dry Cleaning	population; retail service employment	solvent suppliers; trade associations
Degreasing (Cold Cleaning)	industrial employment	trade associations
Architectural Surface Coating	population or residential dwelling units	local MPO
Automobile Refinishing	industrial employment	BEA or E-GAS

Source Category	Growth Indicators	Information Sources
Small Industrial Surface Coating	industrial employment	BEA or E-GAS
Graphic Arts	population	state planning agencies; local MPO
Asphalt Use - Paving	consult industry	consult industry
Asphalt Use - Roofing	industrial employment	local industry representatives
Pesticide Applications	historical trends in agricultural operations	state department of agriculture; local MPO
Commercial/Consumer Solvent Use	population	local MPO; state planning agencies
Publicly Owned Treatment Works (POTWs)	site-specific information	state planning agencies
Hazardous Waste Treatment, Storage and Disposal Facilities (TSDFs)	state planning forecasts	state planning agencies; local MPO
Municipal Solid Waste Landfills	state waste disposal plan	local MPO; state planning agencies
Residential Fuel Combustion	residential housing units or population	local MPO
Commercial/Institutional Fuel Combustion	commercial/institutional employment; population	local MPO; land use map projections
Industrial Fuel Combustion	industrial employment; or industrial land use	local MPO; land use projections; state planning agencies
On-site Incineration	based on information gathered from local regulatory agencies	local regulating agencies and M.O.; state planning agencies
Open Burning	based on information gathered from local regulatory agencies	local regulating agencies and MPO; state planning agencies
Fires: Managed Burning, Agricultural Field Burning, Frost Control (Orchard Heaters)	areas where these activities occur	U.S. Forest Service, state agricultural extension office
Forest Wildfires	historical average local, state, and federal	forest management officials
Commercial Bakeries	population	U.S. Census Data
Paved Roads/Unpaved Roads	Vehicle Miles Traveled (VMT)	U.S. Census Data
Agricultural Tilling	historical trends in agricultural operations	state department of agriculture; local MPO
Construction Activity	construction employment	local MPO; consult industry
Structural Fires	population	local MPO; state planning agencies

Copy of Table 13.1-1 of EIIP Volume X

Each future year will receive its own growth factor. Each growth factor is the ratio of the domain portion of each county's future year industrial employment divided by the domain portion of each county's 1996 industrial employment number.

5.1 GASOLINE DISTRIBUTION

Calculation of Annual Emissions

Evaporative emissions are released any time a petroleum liquid is disturbed and vented to the atmosphere. This category estimates VOC losses beginning the moment refined fuels are loaded for distribution at each refinery until those fuels occupy individual vehicle tanks at a service station. Motor fuel consumption amounts by month for the entire state of Utah is provided by the Utah State Tax Commission. The fuel consumption is then allocated to each county by population.

The fuel distribution process is divided into five distinct phases. Vapor loss occurs during each phase. These phases are:

- (1) The loading of fuel at bulk terminals,
- (2) The transport of fuel in tank trucks,
- (3) The transfer of fuel from tank trucks to service station storage tanks,
- (4) The breathing loss of fuel at service stations, and
- (5) The transfer of fuel from service station tanks to private vehicle tanks.

A comprehensive discussion of the emissions from the first four phases is contained in AP-42² "Compilation of Air Pollution Emission Factors", Section 4.4 and tables 4.3-2 and 4.3-6. The fifth phase is discussed in "Procedures of the Preparation of Emission Inventories for Carbon Monoxide and Precursors of Ozone", EPA-450/4-91-016, May 1991, pages 4-4 through 4-9. "Procedures for Emission Inventory Preparation", Volume IV: Mobile Sources", 1992 edition, pp 35-37, was followed to determine the ambient air temperatures in the calculations. The MOBILE5A model was used to calculate service station vehicle refueling losses. These documents are available for review at UDAQ.

In most area source categories, one of the methods presented in the EIIP has been selected, however UDAQ feels that the EIIP's methods are overly-simplistic when estimating gasoline vapors, falling short by ignoring fluid temperature, reid vapor pressure, and related qualities. Although the EIIP and AP-42 methods share similarities, the UDAQ's selected method is fundamentally better than the EIIP's "preferred" or "alternative" methods.

Vapor losses from each of the five activities are examined separately. Vapor losses from three fuel types (gasoline,

²AP42 document can be found at http://www.epa.gov/ttn/chief/ap42.html#chapter on the EPA website.

gasohol, and aviation fuels) are calculated for this inventory.

A comprehensive discussion of the emissions from the first four phases is contained in Volume III Chapter 11 of the EIIP. Estimates of gasoline delivery emissions will be calculated using Method 1 of the above reference.

Emission factors for gasoline trucks in transit, fuel delivery to outlets, and storage tank breathing are all provided by EPA. No methodologies have been identified to replace the use of these emission factors. These emission factors are listed in the table below. Emission factors for vehicle refueling will be developed through the use of EPA's MOBILE model. This software uses local data (e.g., temperature, fuel volatility) to generate a custom VOC emission factor.

VOC EMISSION FACTORS FOR GASOLINE MARKETING ACTIVITIES²⁸

Emission Source	mg/Liter Throughput	lb/1000 gal Throughput
Gasoline Tank Trucks in Transit		
— Empty Tank Trucks ^b	6.5	0.055
— Full Tank Trucks- ^c	0.5	0.005
Filling Underground Tank (Stage I)		
— Submerged Filling	880	7.3
— Splash Filling	1,380	11.5
— Balanced Submerged Filling	40	0.3
Underground Tank Breathing	120	1.0

a Source: AP-42 Tables 5.2-5, 5.2-7.

Calculation of episode day and typical winter-day emissions

Episode day and winter season day emissions will be calculated by SMOKE.

Calculation of projection emissions

The growth factor in the projection equation will use is equal to the VMT growth rate. (See Projecting Area Source Emissions under Section 5, Area Source Emissions Data).

5.2 DRY CLEANING

Calculation of Annual Emissions

b Midpoint of typical range provided in AP-42. Under extreme conditions, the upper end of the range is 0.37 lb/1000 gal (44.0 mg/L).

e Midpoint of typical range provided in AP-42. Under extreme conditions, the upper end of the range is 0.08 lb/1000 gal (9.0 mg/L).

Emissions of VOC from dry cleaning operations are calculated using Method 2, from Volume III, pages 5-7 through 5-8, of the EIIP (Attachment 1), which uses an emission factor to calculate emissions based on population. In early 1996, the EPA amended their view by excluding perchloroethylene from the definition of a VOC on the basis that it has negligible photochemical reactivity (ref. 61 FR 4588, dated 2/7/96).

Emission Factor

Stoddard solvent 0.36 lb/yr/capita

Commercial perchloroethylene negligible Self-service perchloroethylene negligible

The county populations are obtained from the *U.S. Bureau Of The Census*, *Subcounty Population Estimates* for the year 1996, provided by the Utah Governor's Office of Planning and Budget. There are no dry cleaning facilities reported as point sources in the Utah State Emission Inventory report.

(population) x (0.36 lb VOC / yr / capita) / (2000 lb/ton) = VOC tons / yr

Calculation of episode day and winter-day emissions

Episode day and winter season day emissions will be calculated by SMOKE.

Calculation of projection emissions

Human population, as reported by the U.S. Bureau Of The Census, Subcounty Population Estimates for the year being projected, will be used as the indicator for the growth factor in the projection equation. (See Projecting Area Source Emissions under Section 5, Area Source Emissions Data):

5.3 SOLVENT CLEANING (Previously named Surface Cleaning - Degreasing Emissions)

Calculation of Annual Emissions

The method used to calculate emissions from this process was is per capita as presented as the Alternative Method in Volume III Chapter 6 of the EIIP.

The emissions factors included in this category are:

Automobile Repair

Electronics and Electrical (E&E)

Other

Other

TOTAL

2.5 lb/yr/person

0.21 lb/yr/person

0.49 lb/yr/person

3.2 lbs/yr/person

The manufacturing portion of this category is accounted for in the point source emissions. The 1.1 lb/capita factor for manufacturing is deducted from the total 4.3 lb/capita factor resulting in a factor of 3.2 lb/capita. The county populations are obtained from the *U.S. Bureau Of The Census*, *Subcounty Population Estimates* the Utah Governor's Office of Planning and Budget.

The equation is:

```
(population) x (3.2 lb VOC/yr/capita) / (2000 lb/ton) = VOC tons/yr
```

Solvent cleaning emission factors include emissions from all solvent cleaning except manufacturing. (EIIP Volume 6 Chapter 5 Table 6.5-2) Emissions from solvent cleaning at automobile repair, and E&E electronics and electrical point sources will be subtracted from the eategory emission area inventory total to prevent double counting.

Calculation of episode day and winter-day emissions

Episode day and winter season day emissions will be calculated by SMOKE.

Calculation of projection emissions

Industrial employment will be used as the indicator for the growth factor in the projection equation. (See Projecting Area Source Emissions under Section 5, Area Source Emissions Data).

5.4 SURFACE COATINGS

5.4.1 INDUSTRIAL SURFACE COATING

Calculation of annual emissions

The UDAQ has not previously included the category of Industrial Surface Coating Emissions in the area inventory. This category is included in the EIIP and will be calculated on a per capita basis using the industrial emission factors included in the current guidance. The emission factors are as follows:

Furniture and Fixtures	2.0 lb/capita/yr
Metal Containers	1.3 lb/capita/yr
Machinery and Equipment	1.1 lb/capita/yr
Appliances	0.2 lb/capita/yr
Other Transportation Equipment	0.2 lb/capita/yr
Sheet, Strip, and Coil	0.5 lb/capita/yr

Factory Finished Wood		0.3 lb/capita/yr
Electrical Insulation		0.1 lb/capita/yr
Other Product Coatings		0.6 lb/capita/yr
High-Performance Maintenance	Coatings	0.8 lb/capita/yr
Other Special Purpose Coatings		0.8 lb/capita/yr
•	ΓΟΤΑL	7.9 lb/capita/yr

The emission factor for "Automobiles (new)" and Marine Coatings is deleted from the EIIP list because there are no automobile or boat manufacturing companies in Utah.

County populations are obtained from the Utah Governor's Office of Planning and Budget.

Surface Coating emission factors include emissions from all surface coating in the domain. Emissions from surface coating occurring at point sources within the domain will be subtracted from the category emission total to prevent double counting.

Calculation of episode day and typical winter-day emissions

Episode day and winter season day emissions will be calculated by SMOKE using annual emissions.

Calculation of projection emissions

Population will be used as the indicator for the growth factor in the projection equation. (See Projecting Area Source Emissions Under Section 5, Area Source Emissions Data).

5.4.2 TRAFFIC MARKINGS (Previously included under non-industrial surface coating)

Traffic marking operations consist of marking of highway center lines, edge stripes, and directional markings and painting on other paved and unpaved surfaces, such as markings in parking lots. Materials used for traffic markings include solvent-based paints, water-based paints, thermoplastics, preformed tapes, field-reacted materials, and permanent markers. Solvent-based formulations of alkyd resins or chlorinated rubber resins are the most commonly used traffic paints. This category focuses on applications of traffic paints that emit a significant quantity of volatile organic compounds (VOCs). The use of traffic paints is entirely an area source.

Traffic paints are applied by maintenance crews or by contractors during new road construction, resurfacing, and other

maintenance operations. The method of application is usually a spray.

The paints are subjected to harsher conditions than most other paints and must withstand wear from tires, rain, sun, and other environmental factors for a considerable period of time. Solvent- and water-based paints have roughly the same durability, with both beginning to deteriorate about a year after their application. Both solvent- and water-based paints must be applied in dry conditions and at temperatures above 40 °F. If applied properly, water-based paint is considered to be of better quality than solvent-based paint; however, application of water-based paint is more susceptible to weather constraints such as humidity. Plastic-based paints (i.e., thermoplastics, preformed tapes, and field-reacted systems) are more durable than either solvent- or water-based paints.

Calculation of annual emissions

VOC emissions result from the evaporation of organic solvents during and shortly after the application of the marking paint. Of the painting materials commonly used for traffic marking, three types emit VOCs in appreciable amounts:

- Nonaerosol traffic paint, water- and solvent-based: Solvent-based paints include eliphatic hydrocarbons, toluene, xylene, ketones, and chlorinated hydrocarbons. Water-based paints contain some organic solvent components, usually emulsions of glycols and alcohols; however, the VOC emissions are considerably lower than those from solvent-based paints.
- Aerosol marking paint, water- and solvent-based: These paints are used to apply stripes or markings to outdoor surfaces, such as streets, golf courses, athletic fields, or construction sites. Markings can be either temporary or permanent. Section 5.8, *Consumer and Commercial Solvent Use*, includes an emission factor of 0.0254 lb/person for the use of these products. Total annual emissions in the U.S. for this subcategory are estimated as 3,154 tons of reactive VOC per year. Emissions from these paints are not included in this section.
- C <u>Preformed tapes applied with adhesive primer:</u> Emissions from traffic marking adhesives are included as part of Section 5.8, *Consumer and Commercial Solvent Use*, under the subcategory of "other adhesives." Emissions from these adhesives are not included in this section.

VOC emissions are negligible from application of some alternative paints including thermoplastics, preformed tapes with no adhesive primer, and two-component, field-reacted systems. In addition to the painting material used, VOCs from solvents utilized in cleaning the striping equipment is quantified in this category.

UDAQ will be using Alternative Method 2 in Volume III, Chapter 14 of EIIP to calculated emissions from this category. This method uses an emission factor for lane miles of road painted paired with local data. The emission factors are from a 1988 Control Technology Center (CTC) report (EPA, 1988). Emission factors for solvent- and water-based traffic paints, and for lane miles painted or total lane miles are shown below.

Utah Department of Transportation will provide the number of lane miles in each county, allowing UDAQ to utilize this method. The national default factor for typical annual emissions, in units of pounds per mile and year will be used. The emission factors for solvent-based paints will be used if information about the proportions of solvent-based versus water-based paint is not available. This will result in the most conservative estimate. However, UDAQ would prefer to gather information about the proportions of solvent-based versus water-based paint if at all possible.

The equation used to calculate emissions using these emission factors is:

Inventory Area
Emissions from = Emission Factor * Traffic Lane
Traffic Paints (lb/mile-year)^a miles

The method does not take into account any region-specific use of lower-emitting coatings, such as water-based coatings or thermoplastic tapes. Using the typical annual emissions factor with total lane miles also will not reflect area-specific repainting schedules.

LANE MILE VOC EMISSION FACTORS (EPA, 1988)

Traffic Paint Type	Typical Expected Life (years)	Typical Annual VOC Emissions (lb/mile-year) ^a
Solvent-based	0.75	69
Water-based	1.0	13

Calculation of episode day and winter-day emissions

The temperature during the episode days was never above 55 °F. Therefore, no traffic marking activity is assumed.

Calculation of projection emissions

It is assumed that any future winter episode will have similar temperatures; therefore, no traffic marking emissions will be included in the projection inventory.

5.4.3 ARCHITECTURAL COATING

Calculation of annual emissions

There are several methodologies available for calculating emissions from architectural surface coatings. The method used is dependent upon the degree of accuracy required in the estimate, available data, and available resources. Since architectural surface coatings can be the largest single area source of VOCs in some metropolitan areas, this category warrants the time and effort needed to calculate emission estimates for it.

Most VOC released by these coatings are from the evaporation of VOCs (i.e. drying process) contained in the coating, coating thinners, and thinners used for cleanup. Determining the amount of the VOC in coatings and thinners provides a good estimate of the VOC emitted by this source category. This estimating can be done by survey or population-based estimation methods.

There may be cases when emission estimates from this category may be estimated as one of many processes occurring at a point source for the purposes of permitting and emission tradeoffs. These emissions will be identified and subtracted from the area source estimates.

UDAQ will use the alternative method outlined in Volume III, Chapter 3 of EIIP for calculating emissions from architectural surface coating using population-based usage and emission factors. The procedure is as follows:

- C Determine the per capita usage factor by dividing the national total architectural surface coating quantities for solvent and water based coatings by the U.S. population for the inventory year.
- Determine the VOC emission factors for solvent- and water-based coatings. Emission factors based on weighted averages from a 1990 survey study are listed below. These emission factors are based on the weighted average VOC emission at maximum thinning.

The per capita usage factor is calculated by dividing the total usage of solvent based paints by the U.S. population, and the total usage of water based paint by the U.S. population.

Per Capita Solvent

Based Usage Factor = Gallons of Solvent Based Paints/Population.

= 146,301,000/248,709,873 = 0.59 gallons per person

For water based paints:

Per Capita Water

Based Usage Factor = Gallons of Water Based Paints/Population.

= 452,506,000/248,709,873

= 1.82 gallons per person

This These figures will be updated for each periodic inventory and the emission factors recalculated.

Architectural surface coating emission factors include emissions from all architectural surface coating in the domain.

Emissions from architectural surface coating occurring at point sources within the domain will be subtracted from the category emission total to prevent double counting.

Calculation of episode day and winter-day emissions

The use of architectural surface coatings is influenced by the seasons since spreading and drying characteristics for many paints are dependent on the temperature. Temperatures below 50°F are not suitable for painting, and limit activity. Some painters work around this problem by heating the rooms in which they paint. Regardless, overall activities are restricted. Episode day and winter season day emissions will be apportioned by SMOKE using annual emissions and defaults.

Calculation of projection emissions

Population will be used as the indicator for the growth factor in the projection equation. (See Projecting Area Source Emissions Under Section 5, Area Source Emissions Data).

5.4.4 AUTO BODY REFINISHING

Calculation of annual emissions

Auto body refinishing shops range in size from small shops having less than five employees to volume or "production" shops with over ten employees. Data from 1987 show that the typical refinishing shop employs six persons and performs an average of 13 jobs per week.

Most auto refinishing jobs are performed as part of a collision repair and involve only a small portion of a vehicle, such as a panel or a spot on a panel ("spot" repair). About 17 percent of refinishing jobs involve the entire vehicle. For a typical shop, approximately 90 percent of the work consists of spot and panel repairing, and the entire vehicle is completely refinished only about ten percent of the time. Shops specializing in repainting entire automobiles are referred to as "production" shops.

Auto body refinishing shops may be area or point sources, but the majority of shops are considered area sources of emissions. Point source emissions must be subtracted from total emissions to produce an estimate of auto body refinishing area source emissions.

UDAQ will use Alternate Method 3 of Volume III, Chapter 13 of EIIP to calculated these emissions. This method multiplies population in the inventory area by a per capita VOC emission factor to estimate emissions:

$$E_a$$
 ' $Pop_a \times EF$

where: E_a = emissions for the area

 $Pop_a = area population$

EF = per capita VOC emission factor

The county populations are obtained from the Utah Governor's Office of Planning and Budget. The per capita VOC emission factor of 2.3 pounds per year, recommended in EIIP, will be used. UDAQ will subtract any point source emissions for this category from the emissions total generated using the above equation.

Calculation of episode day and winter-day emissions

EPA reports that auto body refinishing emissions do not demonstrate differences in activity from season to season. Episode day and winter season day emissions will be apportioned by SMOKE using annual emissions.

Calculation of projection emissions

Human population Industrial employment will be used as the indicator for the growth factor in the projection equation. Each future year will receive its own growth factor. Each growth factor is the ratio of the domain portion of each county's future year human population divided by the domain portion of each county's 1996 human population. —(See Projecting Area Source Emissions under Section 5, Area Source Emissions Data).

5.5 GRAPHIC ARTS

Calculation of annual emissions

Emissions of VOC from graphic arts facilities is estimated by using Alternative Method 2 outlined in Volume III Chapter 7 of the EIIP. An emission factor of 1.3 pounds of VOC per capita per year was is applied. The county populations are obtained from the Utah Governor's Office of Planning and Budget. To avoid double counting, any identified graphic art point source emissions with VOC emissions of less than 100 ton/year will be subtracted out as outlined in the EIIP guidance. The emission factor is independent of facilities with emissions greater than 100 tons/year in the inventory area.

(population) x (1.3 lb/VOC/yr/capita) / (2000 lb/ton) = VOC ton/yr.

Calculation of episode day and winter-day emissions

There are no dramatic seasonal fluctuations in production in the graphic arts industry; therefore, it can be assumed that emissions are distributed uniformly throughout the year. Therefore, episode day and winter season day emissions will be apportioned by SMOKE using annual emissions.

Calculation of projection emissions

Population will be used as the indicator for the growth factor in the projection equation. (See Projecting Area Source Emissions Under Section 5, Area Source Emissions Data).

5.6 ASPHALT PAVING (Previously named Cutback Asphalt Use)

Calculation of annual emissions of cutback

Emissions of VOC from cutback asphalt used in Utah are estimated by first determining total annual cutback asphalt usage per county, in tons/year. This information is obtained from the Utah Department of Transportation. The values are then converted to kg/year (2000 lb/ton, 0.45 kg/lb). Other providers of asphalt are not taken into consideration. This oversight will be corrected for the PM $_{10}$ SIP inventory. The manufacture of cutback asphalt at point sources will be assumed to be placed in the county in which it is produced.

Medium cure cutback asphalt (MC) is primarily used in Utah, along with small amounts of high cure cutback asphalt (HC). The densities for both asphalt types are obtained from AP-42 Section 4.5. Rapid cure cutback evaporative losses are estimated at 95% by weight of diluent. Medium cure evaporative losses are estimated at 70% by weight of diluent, and slow cure at 25 percent by weight of diluent. This information is used to calculate the volume of diluent used for each type of asphalt.

As a first step, the weight of asphalt applied is converted from tons to kg.

 W_T and W_D = Total weight of asphalt and weight of diluent

 V_D and V_C = Volume of diluent and cement

 D_D and D_C = Density of diluent and cement

 P_D = Percent diluent by volume

From AP-42:
$$\begin{aligned} W_T &= V_D D_D + V_C D_C \\ \text{and} \quad V_D &= P_D (V_D + V_C) \end{aligned}$$

Solving these equations for V_D :

Asphalt Type	D diluent	D cement	P (% diluent)
Medium Cure	$0.8 \mathrm{kg}/l$	1.1 kg/ <i>l</i>	35%
Rapid Cure	0.7 kg/l	1.1 kg/ <i>l</i>	45%

The diluent is the source of VOC emissions. The total weight of diluent is determined to be:

$$W_D = V_D D_D$$

Volume III Chapter 17 of the EIIP gives the evaporative losses as 70% of medium cure diluent and 95% of rapid cure diluent. Therefore, medium cure emissions equal:

$$W_{VOC}$$
 from MC asphalt = W_D (0.70)
 W_{VOC} from RC asphalt = W_D (0.95)

As a final step, kg/yr VOC is converted to tons/year VOC.

Calculation of typical winter and episode-day emissions

Cutback asphalt application is prohibited by the Utah Air Conservation Rules R307-341 in Salt Lake and Davis Counties except from between October 1 to and April 30. per the Utah Air Conservation Rules R307-341. The temperatures during During the episode days, air temperatures were less than 50 °F. Asphalt is not placed when the ambient air temperatures fall below is under 55 °F; therefore, no asphalt emissions are included in the episode or projection inventories.

5.6a EMULSIFIED ASPHALT USE

Emissions of VOC from emulsified asphalt are determined to be zero or negligible. This was determined after discussing the matter with Cameron Petersen, the Lab Specialist at the head office of the Utah Department of Transportation. In summary, the emulsifying agent soap used by UDOT does not contain volatile organic compounds. The same is true of independent contractors using emulsified asphalt within the emissions area.

5.7 COMMERCIAL & CONSUMER PESTICIDE APPLICATION

Calculation of annual emissions

Pesticides are substances used to control nuisance weeds (herbicides), insects (insecticides), fungi (fungicides), and rodents (rodenticides). Pesticides can be broken down into three chemical categories: synthetics, nonsynthetics (petroleum products), and inorganics. Formulations of pesticides are made through the combination of the pest-killing material referred to as the active ingredient, and various solvents (which act as carriers for the pest-killing material) referred to as the inert ingredient. Both types of ingredients contain VOC that can potentially be emitted to the air either during application or as a result of evaporation.

The pesticide applications occur only during the area's growing season. The domain has a growing season of 184-days.

Calculation of typical winter and episode-day emissions:

The 184-day growing season does not occur during the winter season. Therefore, it is assumed that no emissions occur during episode days. Therefore, no emissions from pesticides will be included in the projection inventory.

5.8 COMMERCIAL/CONSUMER SOLVENT USE

Calculation of annual emissions

The VOC emissions from commercial and consumer solvents are determined by using the per-capita method described in Volume III Chapter 5 of the EIIP. County population statistics are obtained from the Utah Governor's Office of Planning and Budget. Previously the annual emission factor of 6.3 lbs of VOC emitted per capita was applied. However, some of the product categories and emission factors have been updated by the current EPA guidance. The new proposed annual emission factor of 6.06 pounds of VOC per capita will be used to calculate emissions from this category. The 6.06 lb per capita covers:

Personal Care Products

2.32 lb/capita/year

Household Products

Automotive Aftermarket Products

Adhesives and Sealants

2.32 lb/capita/year

0.79 lb/capita/year

1.36 lb/capita/year

0.57 lb/capita/year

Coatings and Related Products 0.95 lb/capita/year

Miscellaneous Products 0.07 lb/capita year

Total 6.06 lb/capita/year

UDAQ has a category for pesticides which are FIFRA-Regulated Products. This has been removed from this category to avoid double counting between two area source categories: Commercial/consumer solvent use and pesticide application.

The following equation is used to determine annual VOC emissions:

(population) x (6.06 lb VOC/capita/yr) / (2000 lb/ton) = VOC tons/yr.

Calculation of episode day and typical winter-day emissions:

Episode day and winter season day emissions will be apportioned by SMOKE using annual emissions.

Calculation of projection emissions

Population will be used as the indicator for the growth factor in the projection equation. (See Projecting Area Source Emissions Under Section 5, Area Source Emissions Data).

5.9 WASTE MANAGEMENT PRACTICES

5.9.1 TREATMENT, STORAGE, AND DISPOSAL FACILITIES (TSDFs)

The emission inventory should include estimated VOC emissions from any existing TSDFs in the domain. In a February 24, 1993, letter from Tim Russ, EPA Region VIII, to UDAQ, EPA provided assistance in identifying and estimating VOC emissions from TSDFs. Following EPA guidelines, UDAQ identified and inventoried TSDFs, all of which were inventoried and reported as point source emitters, none as area source emitters. All of these sources are included in the point source inventory.

Calculation for winter and episode-emission day

There are no area source emissions for this process.

5.9.2 ESTIMATE OF VOC EMISSIONS FROM INDUSTRIAL WASTEWATER TREATMENT (IWTs)

All VOC emissions from existing on-site wastewater treatment facilities within a stationary point source are included as part of the stationary point source VOC emissions.

Calculation for episode-emission day

The emissions are reported under the point source emissions.

5.9.3 PUBLICLY OWNED TREATMENT WORKS (POTWs)

Calculation of annual emissions

As suggested in "Quality Review Guidelines for 1990 Base Year Emission Inventory" EPA 450/4-91-022, September 1991, page 4-7, the SIMS model was used in accordance with the guidance in the "Background Document for the Surface Impoundment Modeling System (SIMS) Version 2.0, EPA -450/4-90-019b to estimate VOC emissions from POTWs.

There are a total of six POTWs in Salt Lake and Davis Counties, serving the needs of the majority of people and industries within the domain. Fluid type, flow rate, and any other relevant specifications are obtained from the managers of these six POTWs, then VOC levels are calculated for each POTW with the SIMS model from those specifications.

Since emissions from any single POTW are relatively low, a factor is calculated by dividing the collective VOC emissions of these six POTWs by their collective daily flow rates, creating a ratio that is applied to the other POTWs in the remaining parts of the domain.

Calculation of typical winter-day emissions:

Although POTW equipment operates seven days a week, the industrial waste yields most of the VOC emissions. For this reason, emissions are distributed over 6 days per week year-round.

(VOC tons/year) / (312 days/year) = VOC tons/day

Calculation for episode-emission day

The emissions are considered the same as an average winter day except for the Sunday episode day. Emissions are considered to be zero on Sunday because of the operation schedule of this type of process. Although, POTW receive household waste on Sunday, industrial waste is negligible. Since industrial waste is the major cause of VOC emissions, the six-day emission schedule is assumed.

Calculation of projection emissions

The growth factor in the projection equation (see Projecting Area Source Emissions under Section 5, Area Source Emissions Data) will use population as the indicator. This is contrary to the growth indicator specified in the EIIP Volume 10 Table 3.1-1 (see Table 2). Projected site specific information is not available at this time.

5.9.4 MUNICIPAL LANDFILLS

Calculation of annual emissions:

An estimate of the amount of waste in place in 1996 for all the landfills in Utah was gathered for the Code of Federal Regulations (CFR) Part 40 Subpart 61 Section WWW regulation, and the landfill parameters were passed through EPA's LANDFILL software model to determine the episode day inventory of VOC emissions. One post-processing revision was made due to EPA's 1997 revision of the model's k-factor from a value of 0.04 to 0.02, halving previous 1996 emission estimates at all landfills. The model does not attempt to estimate PM10 emissions, therefore PM10 (from daily soil-capping activities) was estimated at the domain's largest landfill, the Salt Lake Valley Solid Waste Landfill (SLVSW), and those results were projected onto the domain's remaining landfills. Since soil-capping activity is a function of "daily waste volume", (not "accumulated waste volume"), an annual PM10 factor of 0.67 lbs per-capita was developed from the SLVSW landfill processing.

Effective in 1997, large landfills became Title V sources, therefore those landfills will be inventoried as point sources in the future years. By definition, the Title V rule effects six landfills statewide, leaving the remainder as area source

landfills, inventoried using alternative method 1 of Volume III Chapter 15 of EIIP. For this 1996 episodic inventory, all landfills are inventoried as area sources using the LANDFILL model. The LANDFILL model asks for three basic values: the landfill's opening date, annual quantity of waste received, and projected closing date.

This method is a set of decision-making rules to follow for data collection of landfill waste-in-place and landfill opening and closure dates used in the AP-42 equation or the LANDFILL model.

The landfills in the inventory area will be identified by reviewing the inventory done for 40 CFR Subpart 61 Section WWW. UDAQ will decide which of the smaller landfills in the domain emitted emissions significant enough to warrant the effort needed to produce emission estimates from them. Waste-in-place estimates will be made using either the LANDFILL model for estimating refuse-in-place or determine Weight and converting this to Volume using AP-42 equations.

This alternative method will allow UDAQ the opportunity to prepare fairly reliable estimates for the largest landfills in the inventory area and more uncertain and more conservative estimates for the smaller landfills.

<u>Calculation of typical winter and episode -day emissions:</u>

Landfill emissions are assumed to be a uniform activity; therefore, episode day and winter season day emissions will be apportioned by SMOKE using annual emissions.

Calculation of projection emissions

Population will be the indicator of the projected increase in waste. The increase in emissions from this waste shall be calculated using the landfill model. The emissions from inventoried landfills will be projected as a point source. All other landfill emissions will be included in the area inventory projections.

5.10 LEAKING UNDERGROUND STORAGE TANKS (LUST)

Utah Division of Emergency Response and Remediation track the leakage and replacement of above and below ground fuel storage tanks statewide by county. That office routinely reports *remediation starts* to us, marking the beginning of a multi-month cleanup process.

The process that was done for the 1996 ozone periodic inventory will be repeated for the PM_{10} SIP inventory.

An estimate of the 1996 VOC emissions from the LUST sites located in the domain will be determined using the method set forth in the memorandum dated May 5, 1992 from Glen Rives and Lauren Elmore of Radian.

A report of the remediation activities in the domain will be supplied by the Utah Division of Environmental Response and Remediation (DERR). The Division of Air Quality will look at the date by which DERR approved a contractors corrective action plan, (CAP) for a particular site and use this as an indicator of the projects initiated during the episode

days. This assumption is made due to the difficulty in pinpointing the actual start or completion date of each remediation.

According to R307-413-8, Utah Air Conservation (UACR), De Minimis Emissions from Air Strippers and Soil Venting Projects, no person can conduct a soil decontamination project without a permit unless the emissions from that project are equal to or less than 1.5 tons per year of total hydrocarbons. Mr. Tim Blanchard of our staff reviews the soil remediation projects sent to us by DERR. He informed the inventory staff that the majority of those remediations reviewed were below 1 ton of emissions per project. Based on that information, UDAQ assumes that each site emits 1.5 tons of VOCs per project per year. This conservative estimate should aCacheount for the diminutive number of projects for which emissions may have exceeded the 1.5 ton per year allowed.

In an attempt to make the emissions calculations more accurate, the following additional information will be obtained from DERR to expand the calculation:

- 1) ACacheording to data supplied to EPA by several states covering the types of on-site technologies typically used at LUST sites, it is estimated that 80% of the emissions resulting from these on-site technologies are emitted into the air. This is expressed as .8 in the calculation.
- 2) The database used by DERR has been expanded since the base year inventory was prepared, and is now used by all of the project managers in the LUST section. Therefore, the database will be used to determine the total number of remediations initiated per year.
- The average number of days a project will last will be determined using the worst case scenario of 1.5 tons per project per year (above this limit and the source needs a permit to remediate), and the 28 lbs/day default factor found in the May 15, 1992 memo. Note: the 1.5 emission limit can be found in R307-413-8 and 9, De Minimis Emissions from Air Strippers and Soil Venting Projects. This calculation will be made to document that both the 1.5 limit found in the UACR and the 28 lb limit from the May memo are high estimates for this category.
- 4) To determine emissions for an episode day the total emissions for the season will be divided by 120, the number of days encompassed by the 1996 winter season.

The following calculation is performed to verify that the 28 lbs/day default factor from the May 15, 1992 memo is a high estimate of emissions for these projects. The tracking sheet indicates that many of these projects last over a three-month period. Each project lasts at least:

 $(1.5 \text{ tons/project}) \times (2,000 \text{ lbs/ton}) / (28 \text{ lbs/day}) = 107 \text{ days/project}.$

Calculation for episode-emission day

The emissions will be estimated depending on any leaks occurring on the episode days per DERR files.

Calculation of projection emissions

The emissions from this category will be minimal due to the under ground storage tank rule (40 CFR 280) which required the replacement of numerous underground storage tanks by December 22, 1998. Due to good compliance to this rule, no emissions are expected from this category. Although a few replacements occurred during 1996, emissions were small, and further declining toward December 1998.

5.11 STATIONARY EXTERNAL COMBUSTION

5.11.1 ORCHARD HEATERS

The *Utah Fruit Growers Association* has reported steady-to-sharp decline in the use of orchard heaters from the early 1980s to the present. Prior to this decline, orchard heaters were only used marginally during their peak, usually during the early spring. Further, suburban sprawl has claimed most of the orchards and plantation farms throughout the Wasatch Front counties. Yet further, California (and other out-of-state) growers supply an increasing-large part of Utah's needs and newer technology replaces "smudge pots" and old-style oil-burning orchard heaters with fans or wind machines. For these reasons, statewide annual use is estimated at zero.

Calculation for episode day and winter day emissions

The emissions are considered to be zero.

5.11.2 WOODBURNING/FIREPLACES

5.11.2a SPATIAL ALLOCATION

Calculation of annual emissions

Emission Factors

Emission factors for CO, VOC, NOx, SOx, and PM10 emissions for fireplaces are obtained from AP-42, Table 1.9-1. Units are pounds of pollutant per ton of wood burned.

The emission factors (EFs) for wood stoves are divided among several stove types. AP-42, Table 1.10-1 gives EFs for six types of wood stove. Of these six, UDAQ staff estimated that three types adequately cover wood stove use in Utah. These three types are Conventional, Non-Catalytic, and Catalytic stoves.

Relative Impact of Each Woodburning System

The PARIA survey is utilized to apportion wood stoves among the three stove types. PARIA surveyed 1005 households in Davis, Salt Lake, and Utah counties in February 1993 about their home-heating equipment and tendencies.

From the PARIA questionnaire, responses to the question "How old is your woodburning / coal stove?" were used as a surrogate question to estimate ownership of conventional, catalytic, and non-catalytic stoves. PARIA summarized the results of stove age in the appendix of this section. UDAQ made the assumption that all stoves "older than 10 years" are conventional stoves. Catalytic and non-catalytic stoves claim an increasing market share for more current age groupings. The responses are summarized below. These estimates resulted in a split of each heating system type are as follows:

Stove Age	Conventional	Non-Catalytic	Catalytic	All Types
Less than 1 year old	1%	1%	1%	3%
1 to 3 years	5%	5%	2%	12%
4 to 6 years	18%	8%	2%	28%
7 to 10 years	20%	7%	2%	29%
older than 10 years	28%	0%	0%	28%
Total	72%	21%	7%	100%

The "Canon City Element of Colorado SIP for PM_{10} Matter", July 1988, was used to estimate a split of 20:80 for fireplaces and wood stoves. The percentages are based on wood consumed, not heating system ownership. Intuitively, fireplaces comprise more than 20% of the number of systems. However, stove owners tend to burn larger quantities of wood. The stove percentages above are multiplied by 0.80 to determine the total percentage of wood consumed by fireplaces and each stove type. The emission factors for each type of burning system are then weighted by the percentage of wood burned, to arrive at an emission factor for the hybrid burning system (all types).

	Percentage	VOC	CO	NOx	SOx	PM10
Burner	Of Wood	Emissions	Emissions	Emissions	Emissions	Emissions
Type	Consumed	(lbs / ton)				
Fireplaces	20.00%	229.00	252.60	2.60	0.40	34.60
Conventional Stoves	57.00%	43.80	230.80	2.80	0.40	30.60
Non-catalytic Stoves	17.00%	21.00	140.80	2.40	0.40	19.60
Catalytic Stoves	6.00%	15.60	104.40	2.00	0.40	20.40

Type	% Wood Consumed	CO emissions (lb/ton)
Fireplaces	20%	252.6
Conventional Stoves	57%	230.8
Non-Catalytic Stoves	17%	140.8
Catalytic Stoves	6%	104.4
Weighted Factors - Hybrid System	100%	212.28

The wood consumption per capita of 0.1375 tons per person per year is documented in the Utah PM $_{10}$ SIP. Population estimates are obtained from the Utah Office of Planning and Budget. Unit conversion is applied when needed. The basic equation is:

(Human population) x (annual wood consumed / person) x (lbs pollutant emitted / ton of wood) = uncontrolled annual tons of pollutant.

(population)x(annual wood consumed/person) x (lbs CO emitted/ton of wood) = uncontrolled annual tons of CO.

2.3-3 EIIP Volume IV

5.11.2b TEMPORAL RESOLUTION SEASONAL APPORTIONING

Residential wood combustion is strongly dependant on the season temperature. The method which will be used will be the alternative method in EIIP Volume III Chapter 2. This method allocates the emissions using heating-degree days or, at UDAQ discretion, a seasonal activity factor of 0.43 for the three-month winter burning season.

The method for allocating residential wood burning using heating-degree days is as follows:

- **C** Obtain the number of heating degree days for the inventory season and for the entire year.
 - A heating degree day is a measure of the amount of heating necessary for a particular day. One heating degree day is registered for each degree below 65 °F that the day's average temperature is.

- This information can be obtained from state climatological offices, airport meteorology stations, or National Oceanographic and Atmospheric Administration (NOAA) climate data.

Seasonal Fuel Annual Fuel Degree Days in Season

Consumption = Consumption * Total Heating

(Space Heating) For Space Heating Degree Days Annually

For example, if the heating degree days for an entire year in an inventory area are 2430, and the heating degree days for the inventory period (119 days) are 1800, then the apportioning factor for the inventory area is:

0.74 = <u>1800 inventory period heating degree days</u> 2430 annual heating degree days

A seasonal activity factor of 0.43 can be used for the three-month winter wood-burning season. (EPA, 1991).

Calculation for episode-emission day

Daily Resolution

Residential wood combustion is assumed to occur seven days a week during the heating season.

The Utah Administrative Code, R307-302 restricted the use of residential woodburning devices during the winter when the local meteorology indicated high, or potentially high, concentrations of airborne particulate. A "green light" means that no woodburning restrictions are in effect, a "yellow light" means that voluntary restrictions are in effect, and a "red light" means that mandatory restrictions are in effect. The public is informed of the burn/no-burn condition during daily weather reports conducted by local television and radio stations and on the front page of the daily newspapers. During the winter of 1992/93, violations were curtailed after friendly warning from UDAQ staff. During the winter of 1993/94, warnings were more firm and citations were given to flagrant violators.

The PM₁₀ SIP established a 60% Rule Effectiveness (RE) factor for these PM₁₀-triggered "red" days in Davis, Salt Lake, and Utah Counties. Therefore, emissions released during a "red" episode day will be calculated as 40% (ie., 100% - 60% = 40%) of emissions released on a typical "green" winter day as estimated by SMOKE. In addition, the State recognized that emissions that woodburning emissions will be decreased on "yellow" days due to some voluntary emission reductions. "Yellow" episode days will be calculated as 80% (ie., 100% - 20% = 80%) of emissions released

on a typical "green" winter day.

Calculation of projection emissions

Population will be used as the indicator for the growth factor in the projection equation (see Projecting Area Source Emissions under Section 5, Area Source Emissions Data). The meteorological conditions will be are assumed to be the same as the February 1996 episode. This includes snow cover, cold temperatures, and fog. Episode day emission concentrations triggered UAC-R307-302 woodburning requirements in February 1996. The same conditions in the future will also trigger this rule. Therefore, the projections will project base year emissions which have been calculated taking credit for this rule.

The base-year episodic inventory is tied to actual "Red", "Yellow", and "Green" designations for that episode. Designations for the episodic period, and surrounding days, are:

Calendar Day in February	Day Of Week	Davis	Salt Lake	Utah	Weber
5	Monday				
6	Tuesday				
7	Wednesday				
8	Thursday			R	
9	Friday	R	R	R	
10	Saturday	R	R	R	Υ
11	Sunday				
12	Monday			R	
13	Tuesday			R	
14	Wednesday	R	R	R	
15	Thursday	R	R	R	Υ
16	Friday	R	R	R	
17	Saturday	R	R	R	Y
18	Sunday		7		

Note: R=Red (no-burn), Y=Yellow (please don't burn).

Unspecified cells are Green (burning ok). Unlisted counties and also Green.

The number of woodburning stoves and fireplaces is assumed constant throughout the domain, the number of new installations being offset by retired systems.

5.11.3 BAKERIES

Calculation of Annual Emissions

This category covers volatile organic compounds (VOC) emissions from yeast leavening of baked goods at commercial and retail bakeries, not the exhaust emissions from heating the ovens. Large The two largest bakeries are inventoried as point sources while the remaining smaller bakeries are inventoried as a collective area source. The large bakeries are emitters of 10 tons or more of VOC emissions per year. Emissions from bakeries due to fuel combustion are not included in this category. Yeast-leavened bakery products include bread, bread-type rolls, pretzels, and sweet yeast goods such as doughnuts. Ethanol is the primary VOC emitted from the yeast leavening of baked goods. Baked goods that are chemically leavened with baking powder instead of yeast do not produce VOC and are not included in this source category.

There are two basic types of yeast dough mixing processes used in bakeries: sponge-dough and straight-dough. For the purpose of estimating emissions, the length of the fermentation time is the critical difference between these two processes. It is during the fermentation process that the VOC are produced. The sponge dough process, which is most commonly used by commercial bakeries, produces the largest amount of VOC emissions because the required fermentation time can be five hours or more. The straight dough process is primarily used by retail bakeries and has a much lower VOC emissions than the sponge dough process.

Volume III of the EIIP Area Source Category Method Abstract-Bakeries includes an alternative method of estimating bakery emissions using per capita consumption factor. This is the method that will be used for the PM₁₀ SIP inventory. The human population estimates are obtained from the Utah Governor's Office of Planning and Budget. The emission factor of 0.155 tons VOC per 1000 people was obtained from a memorandum from the Inventory Guidance and Evaluation Section dated April 24, 1992.

(population) x (0.155 tons
$$VOC/yr / 1,000 \text{ people}$$
) = $VOC \text{ tons/yr}$

To prevent double-counting, bakery emissions produced by point-source bakeries will be subtracted from the total areabased emission estimate since those bakeries supply a portion of the needs of all people living inside the domain. In other words, emissions from large bakeries are reported as point sources while emissions from medium and small bakeries are reported as area sources; each reported only once.

Calculation of episode and winter day emissions

Episode and winter season day emissions will be calculated by SMOKE using annual emissions.

Calculation of projection emissions

Population will be used as the indicator for the growth factor in the projection equation (see Projecting Area Source Emissions Under Section 5, Area Source Emissions Data).

5.11.4 RESIDENTIAL AND COMMERCIAL / INSTITUTIONAL COAL COMBUSTION

Calculation of Annual Emissions

This source category covers air emissions from coal combustion in the residential and commercial sectors for space heating or water heating. This category includes small boilers, furnaces, heaters, and other heating units that are not inventoried as point sources. Residential and commercial coal combustion sectors comprise housing units; wholesale and retail businesses; health institutions; social and educational institutions; and Federal, state, and local government institutions (e.g., military installations, prisons, office buildings).

UDAQ will be using EPA's recommended method as described in Volume III, "Area Source Category Method Abstract- Coal Combustion" dated 4-6-1999 in the EIIP. This method is described below.

The preferred source for coal consumption information is the state energy office which is used by UDAQ. Emission factors are available from *AP-42*, Chapter 1: External Combustion Sources; Section 1.1 for bituminous and subbituminous coals. For residential and commercial sources, the emission factor for hand-fed units will be used.

Estimated area source activity or emissions are adjusted by isolating the quantity of coal consumed by residential and small commercial users. This apportionment is done directly by the Utah Department Of Energy and is reported in their annual publication entitled, "Utah Energy Statistical Abstract" In order to account for the predominant usage of natural gas throughout most Utah counties, the coal demand is heavily weighted toward areas without natural gas availability. A 1-to-50 ratio is applied to account for this availability issue. (This 1-to-50 ratio has been used in all inventories since 1993.)

Calculation for typical winter and episode-emission day

UDAQ will apply the same method used to calculate winter and episode emissions from woodburning including the application of a seasonal adjustment factor of 0.43 for the three-month heating season, 92 season days, and rule effectiveness reductions of 60% for "red light" days and 20% on "yellow light" days.

UDAQ reserves the option to refine the seasonal adjustment factor by applying "heating degree day" units instead. A "heating degree day" is a unit of measure used to indicate how cold it has been over a 24-hour period. Daily heating degree days are calculated as the difference between the base value of 65°F and the mean temperature for the day (mean of the high and low temperatures for the day). Annual heating degree days are the sum of the daily heating degree days. Heating degree data is available from the National Oceanographic and Atmospheric Administration (NOAA).

This coal combustion is assumed to occur seven days a week during the heating season. The Utah Administrative Code, R307-302 restricted the use of residential coalburning devices during the winter when the local meteorology indicated high, or potentially high, concentrations of airborne particulate. A "green light" means that no coalburning restrictions are in effect, a "yellow light", means that voluntary restrictions are in effect, and a "red light" means that mandatory restrictions are in effect. The public is informed of the burn/no-burn condition during daily weather reports conducted

by local television and radio stations and in on the front page of the daily newspapers.

The PM₁₀ SIP established a 60% Rule Effectiveness (RE) factor for these PM₁₀-triggered "red" days in Davis, Salt Lake, and Utah Counties. Therefore, emissions released during a "red" episode day will be calculated as 40% (ie., 100% - 60% = 40%) of emissions released on a typical "green" winter day as estimated by SMOKE. In addition, the State recognized that coalburning emissions will be decreased on "yellow" days due to some voluntary emission reductions. "Yellow" episode days will be calculated as 80% (ie., 100% - 20% = 80%) of emissions released on a typical "green" winter day.

Calculation of projection emissions

Population will be used as the indicator for the growth factor in the projection equation (see Projecting Area Source Emissions under Section 5, Area Source Emissions Data). The meteorological conditions will be are assumed to be the same as the February 1996 episode. This includes snow cover, cold temperatures, and fog. Episode day emission concentrations triggered UAC- R307-302 woodburning requirements in February 1996. The same conditions in the future will also trigger this rule. Therefore, the projections will project base year emissions which have been calculated taking credit for this rule. The base-year episodic inventory is tied to actual "Red", "Yellow", and "Green" designations for that episode. Designations for the episodic period, and surrounding days, are listed in section 5.11.2, above.

5.11.5 NATURAL GAS

Calculation of Annual Emissions

Statewide natural gas consumption data is supplied by Questar Corporation allowing UDAQ to utilize EPA's Preferred Method discussed in Volume III *Residential and Commercial/Institution Natural Gas and Liquefied Petroleum Gas (LPG) Combustion* section of the EIIP. The data consisted of county-wide, annual consumption in millions of Btu for general service gas customers (GSDTH) and major gas customers (NONGSDTH). It is assumed that all industrial natural gas consumption is included in the point source inventory. The industrial consumption, from the point source inventory, is subtracted from the NONGSDTH numbers, and the remainder is assumed to be consumed by commercial/institutional sources.

The first step is to convert the fuel consumption from MMBtu to MMCF. In a letter dated February 2, 2000, Questar Corporation stated that their gas averages 1,055 Btu per cubic foot.

$$(MMBtu) / (1,055 Btu/CF) = MMCF$$

Emission factors for NO_x , CO, PM, and SO_2 are drawn from Tables 1.4-1 and through 1.4-3 of the AP-42 are used to calculate natural gas combustion emissions for domestic residential and commercial boilers. VOC factors are drawn from the 1996 Periodic Ozone Inventory, section 5.11.5.

(emission factor, lbs/MMCF) x (fuel consumption) x (1 ton/2000 lb) = emissions in ton/year.

Calculation of Typical Winter-Day and Episode-Emission Day

Episode and winter season day emissions will be calculated by SMOKE using annual emissions.

Calculation of projection emissions

Population will be used as the indicator for the growth factor in the projection equation (see Projecting Area Source Emissions under Section 5, Area Source Emissions Data).

5.11.6 FUEL OIL COMBUSTION (Previously named Oil Combustion)

Calculation of Annual Emissions

The Utah Energy Statistical Abstract documents the amount of fuel oil consumed by residential sources, commercial sources, and industrial sources in the state of Utah. It is assumed that the consumption of oil along the Wasatch Front as compared to consumption of fuel oil in the rest of the state is 1 to 10. First, a consumption factor is calculated using the 1 to 10 ratio described above. Population estimates are obtained from the Utah Office of Planning and Budget. The amount of fuel oil consumed is then determined by multiplying the consumption factor by the population of the given county or city. The fuel oil consumed by industrial sources and accounted for in the point source inventory is subtracted from the industrial fuel oil consumption for industrial area sources.

For example:

OCW = Oil consumed/person in the 4 Wasatch Front Counties

OCNW = Oil consumed/person in the rest of the state

OC = total oil consumed/year in Utah

WP = Wasatch Front population

NWP = Population in the rest of the state

$$(OCW \times WP) + (OCNW \times NWP) = OC$$

and
 $(10) \times (OCW) = OCNW$

Therefore:

$$OCW = OC / (WP + (10 \times NWP))$$

The fuel oil consumed in each non-attainment area is calculated as follows:

Oil consumed in County, Davis County = OCW x (population of County, Davis County).

Using these numbers and the emission factors in AP-42, in table 1.3-2, the emissions are calculated.

(EF, lbs/ton) x (OC tons/yr) x (1 ton/2,000 lb) = emissions in ton/year.

EF = Emission Factor OC = Fuel Consumption

Calculation of typical winter and episode-day emissions

Since natural gas consumption records (available through Questar Gas Company) are more detailed than fuel oil records, consumption of both are generally linear, and both are loosely linked to seasonal ambient air temperatures, UDAQ assumes that seasonal fuel oil use tracks with seasonal natural gas use. Further, there are 119 days in the winter season.

($\frac{\text{VOC}}{\text{pollutant}}$, tons/yr) x (%NG use in winter) / (119 days/winter season) = $\frac{\text{VOC}}{\text{pollutant}}$, tons/day.

Calculation of projection emissions

Population will be used as the indicator for the growth factor in the projection equation (see Projecting Area Source Emissions Under Section 5, Area Source Emissions Data).

5.11.7 BREWERIES, WINERIES, DISTILLERIES

Telephone survey with the state's two largest breweries led to very low emissions estimate. The facilities are considered to be micro breweries. The emissions are negligible based on the amount of beer produced in these facilities. This category is not included in EIIP.

5.11.8 CATASTROPHIC/ACCIDENTAL RELEASES

There were no catastrophic/accidental releases in the PM_{10} domain during 1996. Therefore, emissions during the PM_{10} season are estimated at zero.

5.11.9 SYNTHETIC ORGANIC CHEMICAL STORAGE TANKS (SOCST)

No data has been found that this type of material is stored in Utah. Therefore, the emissions are zero for this category.

5.12 SOLID WASTE INCINERATION AND OPEN BURNING

5.12.1 INCINERATION

Volume III, Area Sources Preferred and Alternative Methods of EIIP does not include incineration. New Source Performance Standards have been developed for incineration sources, and therefore, they are included as point sources. UDAQ will not include this category in the 1996 PM₁₀ episode inventory under air area source listings.

5.12.2 FOREST FIRES

Calculation of annual emissions

Forest fire data is collected by the Utah Division of State Lands and Forestry. They compile data for total acres burned on public and private lands (by county) excepting private house and field fires inside metro area. Emission factors for forest and range fires for the Intermountain Region, Region 4, are obtained from AP-42. These factors are based on an average fuel loading of 40 Mg/hectare in this region.

First, the emission factors are converted to English units.

(EF, kg/hectare) x $(1.1023 \times 10^{-3} \text{ tons/kg}) / (2.471 \text{ acres/hectare}) = \text{EF tons/acre}$.

Then the emission factors are multiplied by the number of acres burned to obtain the annual emissions for each county.

(EF, tons/acre) x (acres burned/yr) = emissions tons/yr.

Calculation of typical winter and episode-day emissions

Forest fires occur primarily during the summer months. The fire season typically lasts 184 days/year according to USFS, Intermountain Regional office staff. (Same length accepted in past years.) After reviewing information supplied by Utah Division of State Lands and Forestry, the accepted clearing house for forest and range burning, it was determined that there were no forest fires in the domain during 1996 winter season; and therefore, no fires occurred during the episode period.

Calculation of projection emissions

Since the projections will be based on a winter day which is not included in the fire season and since typically there is snow cover, emissions from this category will be assumed to be zero.

5.12.3 FIREFIGHTING TRAINING

Telephone surveys in 1991, and repeated in year 2000, confirm that fire training activities occur primarily in simulators with theatrical smoke. Actual fire training events are random and rare. UDAQ assumes that emissions are negligible.

5.12.4 STRUCTURE FIRES

Calculation of annual emissions

Structural fires are estimated by Alternative Method 2 outlined in Volume III, Chapter 18 of EIIP. This method calculates the emissions by multiplying human population (by county) by national-default emission factors. In the absence of local trends, national average conditions will be projected onto our domain: Six fires per 1000 residents and 1.15 tons of material burned per average fire. Emission factors for VOC, NO_x , and PM are included in this EPA guidance document. These factors are multiplied by the population of each city or county to obtain the annual emissions of VOC, NO_x and PM_{10} . Population numbers are obtained from the Utah Governor's Office of Planning and Budget.

(population)(6 fires/1000 people)(1.15 tons material/fire)(EF, lbs/ton material) = emissions tons/yr.

Calculation of episode and winter emissions

Episode and winter season day emissions will be calculated by SMOKE using annual emissions.

Calculation of projection emissions

Population will be used as the indicator for the growth factor in the projection equation (see Projecting Area Source Emissions Under Section 5, Area Source Emissions Data).

5.12.5 PRESCRIBED BURNING/SLASH BURNING/AGRICULTURAL BURNING

Calculation of annual emissions

Annual emissions for both slash and prescribed burning are included as part of the "Forest Fire" emissions reported in section 5.12.2, above. For this reason, any additional emissions from slash and prescribed burning are estimated as zero in section 5.12.5. Calculations for agricultural burning is described below. Any slash or prescribed burning by the Forest Service is accounted for in the Forest Fire section of this inventory.

Annual emissions for agricultural burning are calculated by combining some hard data with some basic assumptions. very difficult to estimate. Richard Harvey, Director of Davis County Environmental Health & Laboratory Division, estimated that 1/3 of the post-harvest chaff and plant stems from planted acres in this area are burned and 2/3 are plowed under. The number of harvested acres, per county, is obtained from the Utah Department of Agriculture. A fuel loading factor of 2 tons per acre is obtained from AP-42, Section 2.5 Open Burning, Table 2.5-5.

(harvested acres) x (1/3) x (2 tons/acre) = tons of material burned.

Emission factors from AP-42, Table 2.5-5 for PM, CO and VOC will be used. These emission factors will be multiplied by the tons of material burned to obtain annual emissions.

(tons of material burned) x (EF lbs/ton) x (1 ton/2000 lbs) = emissions tons/yr.

A population comparison was done in the 1990 base year inventory to see if the calculated emissions seemed feasible.

Calculation of typical winter day, episode-emission day, and projection emissions

Due to cold and snow-covered conditions, it is reasonable to assume that agricultural burning will not occur during episode days, therefore no emissions will be calculated or projected for this category.

5.12.6 OPEN BURNING

According to State of Utah, Utah Air Conservation Rules, R307-202-5(3)(e)(I), open burning is not allowed without a permit. Permits are only issued during a 30-day period between March 30 and May 30, thereby prohibiting emissions during the winter months. Therefore, open burning emissions are not included in the PM_{10} SIP inventory.

Previously detonation was included in this category. EIIP does not include it as an area source. Companies that do detonation are included in the point source inventory.

5.12.7 AIRCRAFT/ROCKET ENGINE FIRING AND TESTING

Calculation of annual emissions

1. Rocket testing

No rocket testing occurs within the domain that has not otherwise been accounted for under the point source inventory.

2. Aircraft testing, tuning, and repair

A UDAQ 1991 telephone survey of eight airplane maintenance agencies indicated that maintenance procedures emit approximately 0.7% to 1% of the emissions of landing/take off (LTO) events. For this reason, UDAQ added 1% to LTO emissions to account for airplane fleet maintenance.

Calculation of typical winter and episode-day emissions

Daily emissions for airport LTOs are calculated in the non-road portion of this inventory. The same 1% factor is applied to the daily emissions from LTOs to determine the daily emissions from aircraft maintenance.

(LTO emissions in tons/day) x (1%) = aircraft maintenance emissions tons/day.

Calculation of projection emissions

The growth factor in the projection equation (see Projecting Area Source Emissions under Section 5, Area Source Emissions Data) will use population as the indicator.

5.12.8 CHARCOAL GRILLING

In 1993, this category was believed to be negligible, prompting EPA Region VIII to issue their 8/19/1993 letter saying that "...charcoal grilling emissions do not have to be addressed by the State at this time." Therefore, they were not calculated in 1996.

5.12.9 VEHICLE FIRES

Calculation of annual emissions

This category covers air emissions from accidental vehicle fires. Vehicles included are any commercial or private mode of transportation that is authorized for use on public roads.

The number of vehicle fires will be requested from state and local fire marshals and the public safety departments. If the information is not available for 1996, the national estimate of vehicle fires from *Fire in the United States* (FEMA, 1997) (available from the Federal Emergency Management Agency http://www.usfa.fema.gov/nfp/data/fius9th.htm) will be used. The national total of transportation fires reported in the FEMA report must be corrected by subtracting the number of non-roadway fires reported such as rail, water, and air transportation fires. In 1994 the respective percentages of fires reported for these non-roadway transportation modes were 0.2, 0.5, and 0.1 (i.e., 99.2% of the

fires were highway vehicle fires). National highway vehicle fires in 1994 are estimated to be 402,000 fires. The national estimate will be apportioned to the local level using state vehicle miles traveled (VMT).

Emission factors are taken from AP42, Section 2.5, Open Burning. These factors cover automobile components including upholstery, belts, hoses, and tires. The amount of vehicle material burned (the fuel loading) in a vehicle fire must be estimated to use these factors. A conservative assumption is that an average vehicle has 500 pounds of components that can burn in a fire, based on a 3,700 pound average vehicle weight (CARB, 1995).

The emission factors (EPA 1996) are as follows:

Pollutant	Lbs/ton burned	
PM	100	
CO	125	
Methane	10	
Nonmethane TOC	32	
NO_{v}	4	

Calculation for episode-emission day

The emissions are calculated from theoretical fires that are presumed to occur during any episode day based on human populations and national vehicle fire default values.

Calculation of projection emissions

The growth factor in the projection equation (see Projecting Area Source Emissions under Section 5, Area Source Emissions Data) will use population as the indicator.

5.13 BARGE, TANK, TANK TRUCK, RAIL CAR AND DRUM CLEANING

5.13.1 BARGE CLEANING

No barges are used to transport materials on any of Utah's small rivers or the Great Salt Lake. The estimated VOC emissions from this process is zero.

5.13.2 CHEMICAL TANK EMISSIONS

Various tank emissions are included as portions of all three inventory headings: the Point, Area, and Mobile source headings. Because these emissions are already accounted for in the rest of the inventory, this section is a negative

declaration. In review, the following storage tanks are covered under the following inventory sections:

Point Source Inventory

VOC losses from on-site petroleum tanks at all fuel refineries within the NAA.

VOC losses from on-site containers of fuels, solvents, and coatings used or consumed by point sources covering the industries listed in the point source inventory report.

Area Source Inventory

VOC losses from the distribution of fuel to gas stations within the domain. Area source accountability includes fuel loading at bulk terminals, tank trucks in transit, tank trucks during unloading at gas stations, service station breathing losses, and refueling of private vehicles. Estimates are based on gallons of fuel distributed.

VOC losses from the storage of solvents used for parts degreasing.

VOC losses from the use of solvents assisting the printing and graphics industries.

VOC losses from the storage of cutback and emulsifiers for asphalt production and application.

VOC losses from tanks at dry-cleaning operations.

VOC losses from the storage of miscellaneous commercial/consumer solvents.

The area source inventory emissions are accounted for under other categories.

Calculation for winter and episode-emission day

The emissions are considered to be negligible or zero for this category because they are accounted for under separate categories.

5.13.3 EMISSIONS FROM TANK TRUCK CLEANING

Calculation of annual emissions

Emissions of 0.11 tons per year (tpy) for Salt Lake County, and 0.03 tpy for Davis County were calculated for this category in the 1990 inventory. Because the emissions were low, the calculations have not been repeated, and emissions from this category are presumed to continue to remain low both annually and season days.

Due to these low emissions, no additional calculations will be made for the domain.

Calculation for winter and episode-emission day

The emissions are negligible.

Calculation of projection emissions

This category will not be included in the projection calculations.

5.13.4 RAILCAR CLEANING

Calculation of annual emissions

Based on the research completed for this category, it is the State's conjecture that railcar cleaning companies in the domain are nominal or nonexistent and, therefore, any emissions from this type of cleaning process are reported to be zero.

5.13.5 DRUM CLEANING

Calculation of annual winter and episode-day emissions

Total 1990 emissions of 86 pounds per year of NO_x and zero emissions of VOC were released into the air shed for this category. Because the emissions are so low, the calculations have not been repeated for 1996, and emissions from this category are assumed to be negligible for annual emissions and typical winter day emissions.

- 6. MOBILE SOURCES
- 6.1 NON-ROAD MOBILE

6.1.1 AIRCRAFT

Calculation of Annual Emissions

The airports in Utah are divided into two categories, large airports which require a more detailed inventory, and general aviation airports which require a less detailed inventory. There are two large airports in Utah, the Salt Lake City International Airport (SLCIA), and Hill Air Force Base. The rest of the airports do not have a large number of flights per year, and are considered general aviation airports.

1. Large Airports

a. Salt Lake City International Airport

Aircraft at the Salt Lake City International Airport (SLCIA) are divided into five categories for the purpose of this inventory: (1) commercial carriers that are listed in the FAA Aircraft Engine Emissions Database (FAEED), (2) military aircraft that are listed in the FAEED, (3) other commercial carriers or military aircraft, (4) general aviation aircraft, and (5) air taxi aircraft.

I. Civilian Aircraft that are listed in the FAEED

The FAEED calculates emissions from aircraft based on the number of landing and takeoff cycles (LTO) that occur at the airport in a year. The annual number of departures for each type of commercial carrier, which corresponds to the number of LTO, is obtained from The Airport Activity Statistics of Certificated Route Air Carriers. If an aircraft type is not included in the database, a similar aircraft is used as a surrogate. The World Encyclopedia of Civil Aircraft and Jane's All the World's Aircraft are used to identify similar aircraft. If a similar aircraft is not identified, the emissions are calculated as described in section iii below. The average taxi in/taxi out time for Delta Airlines is used for all aircraft at the SLCIA.

The type of aircraft, the probable engine on each aircraft, and number of LTO for that engine type, and details about the taxi and idle times are entered into the database. Tim Gwynette, the Environmental Programs Coordinator at SLCIA, provided a cross-referencing index to associate aircraft names and their common abbreviations. The software is used to then calculate emissions of PM_{10} , VOC, SO_x and NO_x for each type of aircraft. Since the software does not calculate PM_{10} , Table 5-4 of EIIP Volume IV: Mobile Sources is utilized. Although PM_{10} factors are sketchy in Volume IV, currently these are best available factors.

ii. Military Aircraft that are listed in the FAEED

The total number of military aircraft operations at the SLCIA are obtained from the Steve Domino and/or his representative at CMH2MHill. LTO cycles are determined by dividing the number of operations by two. Three types of military aircraft typically use the airport: Lockheed C-130, Boeing C-135B, and Lac Georgia C141B, however, the number of LTOs for each type of plane is not available. Each of the aircraft emissions are calculated using the FAEED assuming the entire LTO number for military aircraft applied to that aircraft. The total emissions are then divided by three to obtain the emissions from this category of aircraft.

iii. Other Commercial Carriers or Military Aircraft

Several types of aircraft that operate at the SLCIA are not included in the FAEED, and a similar aircraft could not be identified. The emissions from these aircraft are calculated separately, using the method outlined in "Procedures for Emission Inventory Preparation Volume IV: Mobile Sources," EPA-450/4-81-026d. Factors for Hydrocarbons (HC), CO, NO_x , and SO_2 are fairly straightforward, while factors for PM_{10} are sketchy but utilized to the extent practical.

Information about the engine used on the aircraft is obtained from tables within Volume IV, including fuel flow, average time, and emission factors in four modes of operation: takeoff, climb out, approach, and taxi/idle. Aircraft manufacturers were contacted, as needed, to obtain additional information about the engines used in a particular aircraft. The taxi/idle default times were replaced by average taxi in/taxi out times for Delta Airlines at the SLCIA. The emissions for a particular pollutant in each mode are calculated using the following equation.

```
NOx pollutants (tons/yr) = \frac{\text{time (minutes)} * \text{fuel flow (lbs/min)}/1000 * (lb pollutant/1000 lb fuel) x (# of engines/plane) * (# of LTO cycles/yr) * (1 ton/2000 lbs)}
```

The emissions during all four modes are then added to obtain the total emissions, in tons/yr, for that type of engine.

iv. General Aviation Aircraft and Air Taxis

Smaller aircraft, without detailed information are categorized by the Wasatch Front Regional Council as general aviation aircraft and air taxis. Emissions from these aircraft are calculated using general aviation and air taxi emission factors from "Procedures for Emission Inventory Preparation Volume IV: Mobile Sources," EPA-450/4-81-026d.

 NO_x pollutants (tons/yr) = (# of LTO cycles) * (lb pollutant/LTO cycle) * (1 ton/2000 lbs)

b. Hill Air Force Base

Aircraft at Hill Air Force Base (HAFB) are divided into four categories for the purpose of this inventory: (1) military aircraft that are listed in the FAEED, (2) military aircraft listed in EPA guidance, (3) other military aircraft, and (4) touch and go activities. Actual flight statistics are received from Hill AFB and utilized in these calculations.

I. Military Aircraft that are listed in the FAEED

The FAEED calculates emissions from specific types of aircraft based on the number of landing and takeoff cycles (LTOs) that occur at the airport in a year. The annual number of landing and takeoff cycles (LTOs) for each type of aircraft is obtained from Hill Air Force Base. If the type of aircraft is not included in the database, a similar aircraft is used as a surrogate. The World Encyclopedia of Civil Aircraft and Jane's All the World's Aircraft are used to identify similar aircraft. If a similar aircraft is not identified, the emissions are calculated as described in section ii below.

The (1) type of aircraft and (2) number of LTOs are entered into the FAEED database, and calculations made of VOC, CO, and NO_x emissions. EIIP Volume IV was used to estimate PM₁₀ emissions.

ii. Military Aircraft listed in EPA guidance

Several aircraft operated at Hill Air Force Base are not included in the FAEED, and a similar aircraft could not

be identified. The emissions from these aircraft are calculated separately, using the method outlined in "Procedures for Emission Inventory Preparation Volume IV: Mobile Sources," EPA-450/4-81-026d.

Information about the engine used on each type of aircraft is obtained from tables within Volume IV, including fuel flow, average time, and emission factors in four modes of operation: takeoff, climb out, approach, and taxi/idle. The emissions for a particular pollutant in each mode are calculated using the following equation.

```
PM_{10} pollutant (tons/yr) = time (minutes) * fuel flow (lbs/min)/1000 * (lb pollutant/1000 lb fuel) * (# of engines/plane) * (# of LTO cycles/yr) * (1 ton/2000 lbs)
```

The emissions during all four modes are then added to obtain the total emissions, in tons per year, for that type of engine.

iii. Other Military Aircraft

There are several types of aircraft that are not addressed in the FAEED or in EPA guidance. In these cases, the emissions calculated by Hill Air Force Base in their annual emissions inventory are used.

iv. Touch and Go Activities

Touch and go operations at Hill Air Force Base could not be calculated using the FAEED model or by using the Volume IV guidance. For these operations, the emissions calculated by Hill Air Force Base in their annual emissions inventory are assumed to be accurate. This approach was approved by Tim Russ, EPA Region VIII, in a letter dated June 2, 1993.

2. General Aviation Airports

Most of the airports in Utah are small, local airports. Detailed information about the types of planes, and the number of flights for different planes is not available. Because detailed information is not available, the fleet average procedures outlined in "Procedures for Emission Inventory Preparation Volume IV: Mobile Sources," EPA-450/4-81-026d are used to calculate emissions. The number of operations at each airport per year is supplied by the Wasatch Front Regional Council. The number of landing and takeoff cycles (LTOs) is calculated by dividing the number of operations by two. Emissions from these flights are calculated using the general aviation emission factors from Volume IV.

NOx pollutants (tons/yr) = (# of LTO cycles) * (lb pollutant/LTO cycle) * (1 ton/2000 lbs)

Calculation of typical winter-day and episode-day emissions

Episode and winter season day emissions will be calculated by SMOKE using annual emissions.

Calculation of projection emissions

The growth factor in the projection equation (see Projecting Area Source Emissions under Section 5, Area Source Emissions Data) will use population as the indicator.

6.1.2 RAILROAD LOCOMOTIVES

The actual railroad diesel consumption by county is multiplied by national-default emission factors to calculate these emissions. Each rail company reported their own activity and diesel use. Emissions are not included in counties that do not have rail lines. No seasonal differences are noted.

Calculation of Annual Emissions

1. Line Haul Emissions

Three railroad companies are operating in the domain area during 1996; Southern Pacific Lines, Utah Railways Company, and Union Pacific Railroad. Each company consumed diesel fuel to drive their locomotives. All three reported their diesel consumption by county.

Emission factors are obtained from "Procedures for Emission Inventory Preparation, Volume IV: Mobile Sources," EPA-450/4-81-026d, July 1989, page 204, table 6-1.

(diesel consumption, gal/year) x (EF, lb/gal) / (2000 lb/ton) = emissions, tons/yr.

2. Yard Emissions:

These railroad companies provided information about the number of yard engines that are operating in the area. The number of engines is averaged between days of the week and different shifts to provide an average number of yard engines. Emission factors are obtained from Volume IV, pages 206-207, table 6-2.

(Number of yard engines) x (EF, lbs/engine/yr) / (2000 lb/ton) = emissions, tons/yr.

Calculation of typical winter day and episode-emission day

Emissions released during typical winter and episode days will be calculated by SMOKE software.

Calculation of projection emissions

Changes in transportation employment, as projected by the Utah Office Of Planning And Budget, will provide the growth factor in the projection equation (see Projecting Area Source Emissions under Section 5, Area Source Emissions Data).

6.2.3 MISCELLANEOUS NON-ROAD EQUIPMENT

Calculation of Annual Emissions

EPA headquarters has recently released a software model, entitled NONROAD, to calculate emissions from all categories of non-road equipment designed for construction, manufacturing, lawn and garden maintenance, and recreational uses. UDAQ will utilize this software, following the EPA's guidance for its use and application.

The intent of the NONROAD software is to include *all* nonroad activity in each county. Trial calculations of the counties inside our domain show reasonably-accurate results using the software's internal default parameters with a few exceptions: (1) the category entitled "Recreational Equipment" gives annual, seasonal, and daily pollution quantities that are too large, and (2) nonroad emissions from Hill Air Force Base should be included but are not. Since the NONROAD model was designed to calculate nonroad emissions in every county inside each of the 50 States, EPA model programmers acknowledge that these expressed oversights are not uncommon and that UDAQ should make local adjustments when local errors or omissions are found. Further, (3) when tabulating all Point, Area, and Mobile emissions within the domain, care is needed to insure that nonroad activities are not double-counted (or potentially triple-counted) between these three large sections of the inventory: the Point, Area, and Mobile sections. Each of these three concerns are addressed separately.

(1) Accurately Reflecting Recreational Equipment:

On request, the model will itemize its estimate of emissions for each of eleven source classifications. These eleven classifications are: Agricultural Equipment, Airport Equipment, Commercial Equipment, Construction and Mining Equipment, Industrial Equipment, Commercial Lawn and Garden Equipment, Residential Lawn and Garden Equipment, Logging Equipment, Pleasure Craft, Railroad Equipment, and Recreational Equipment.

During our February 1996 episode, snowmobiles are the only equipment that appears to fit the description of "Recreational Equipment" and "Pleasure Craft". From other sources, UDAQ staff estimated snowmobile emissions for the entire UAM-AERO domain, discovering the result to be very similar to the NONROAD's emission estimate for all "Pleasure Craft" in the domain. For this reason, UDAQ entirely deleted the "Recreational Equipment" classification and retained the "Pleasure Craft" classification exactly as given; accepting "Pleasure Craft" to completely cover snowmobile usage during an episode day, and further accepting it to reflect all other so-called sport-utility equipment during the remainder of the year.

(2) Including nonroad equipment at Hill Air Force Base:

For mixed reasons, the activity at military air bases is not reflected in the NONROAD software and must be included by another method. Since Hill Air Force Base (HAFB) reports its emissions from ground activity directly to UDAQ, those emissions, -once checked by UDAQ Point Source staff-, were added to "Airport Equipment" in Davis County. Although HAFB crosses the boundary between Davis and Weber counties, Davis is the county with the majority of the source and all emissions are assigned to Davis for bookkeeping purposes.

(3) Preventing multiple-counting of Emissions:

The intent of the NONROAD software is to include *all emissions* from nonroad activity in each county. Since many

industries within the UAM-AERO domain itemize their own nonroad emissions (on Form F12: "Off-Highway Mobile Sources"), those itemized emissions, -once checked by UDAQ staff-, are assumed to be more accurate than the emissions attributed to them by the NONROAD software. For this reason, these F12 emissions are spatially and temporally located and an equal emission tonnage is subtracted from the NONROAD-modelled emissions for that county. If F12 emissions within a given county *exceed* the quantity of emissions calculated by the model for that county, the final quantity will be held at zero for that source classification. To date, no county has F12 emissions that exceed its modelled emissions, however, if this occurs, the deficit will be subtracted from the same source classification from an adjacent county(s) under the assumption that the NONROAD model was not sensitive to localized resource trading (ie; equipment, materials, or employees) among neighboring counties.

Mobile emissions, calculated with the MOBILE software by the metropolitan planning organizations (MPO), only include registered vehicle activity on paved public roads; therefore, any vehicle activity on private land is not included in the "On-Road Mobile" portion of this protocol. For this reason, any vehicle activity reported by industry on Form F12 *that is not among the eleven source classifications itemized in the NONROAD model* will be retained in the Point Source reporting, thereby counting that activity once and only once.

Specific Applications

Specific examples of the application of these bookkeeping principles are illistrated with Kennecott Utah Copper and Kennecott Barneys Canyon, Geneva Steel, and Hill Air Force Base.

Example #1: Kennecott - -

The NONROAD model reports "Construction and Mining Equipment³" emissions during the 1996 year and a "typical 1996 February weekday⁴ (tpd)" in Salt Lake County to be:

Total VOC⁵, 2,252.82 tons per year (tpy, 1996), 4.87 tons per day (tpd); Exhaust NOx, 11,139.28 tpy, 23.78 tpd; Exhaust CO, 12,580.87 tpy, 26.44 tpd; Exhaust PM10, 1,363.05 tpy, 2.94 tpd; Exhaust SOx, 2,594.82 tpy, 5.50 tpd.

³ The model does not separate Construction and Mining activity. Furthermore, the model defines mining as underground tunnelling only. The model defines open-pit aquisition of precious metals as construction activity. Intuitively, Kennecott's equipment and activities more closely parallel a traditional construction site than a mine.

⁴ The model will not specify a unique year-month-day. However, it will specify a weekday or weekend day within a given month and year. Our nine-day episode includes eight weekdays and one weekend day.

⁵ "Total VOC" is the sum of "Exhaust VOC", "Crankcase VOC", "Diurnal VOC", "Vapor Displacement VOC", and "Spillage VOC". Exhaust VOC is always the majority of Total VOC. In this case, 4.66 of 4.87 tons per episode weekday and 2,158.93 of 2,252.82 annual tons.

These tonnages are significantly larger than tonnages from the same source classification in any of the other domain counties, suggesting that the NONROAD database is aware of Kennecott's presence within Salt Lake County. If these NONROAD tonnages and Kennecott's F12 tonnages are assumed accurate, then the county's NONROAD activity minus Kennecott's F12 activity will reveal nonroad activity from other Point Sources plus bonafide Area Sources, and subtracting F12 emissions from all reporting Point Sources from the NONROAD tonnage will give only bonafide Area Sources tonnages. This same principle holds for other counties that have a mix of Point Sources (that report on Form F12) and traditional Area Sources. Those counties will be handled in the same manner as Salt Lake County.

Trial calculations from this NONROAD software show reasonably accurate results using the software's internal default parameters with one glaring exception: the category entitled "Recreational Equipment" gives pollution levels that are far too high for a February episode day in the domain. A careful review of the NONROAD Users Guide acknowledges this weakness.

The model also calculates emissions for another similar category entitled "Pleasure Craft". During a February episode day, the only equipment in Utah that appears to fit this description are snowmobiles. Using educated guessing, UDAQ staff estimated snowmobile emissions for the entire UAM-AERO domain, discovering the result to be very similar to the NONROAD's emission estimate for all "Pleasure Craft" in the domain.

For these reasons, UDAQ will delete the "Recreational Equipment" category altogether and retain the "Pleasure Craft" category exactly as given; accepting the latter category to be entirely snowmobile usage during an episode day.

Calculation of typical winter day and episode-emission day

The NONROAD software will directly calculate emissions during a typical episode weekday and typical episode weekend day. It appears that no additional refinements can be made for specific episode days.

7. POINT SOURCE EMISSION DATA

The 1996 statewide annual emissions inventory for point sources will be used to derive the modeling domain inventory. The point source data is extracted by county and then filtered by Universal Transverse Mercator (UTM)⁶ data to determine which inventoried sources are within the modeling domain. These sources include the major and Title V⁷ sources, sources with 10 tons/year of VOC in Salt Lake and Davis Counties, sources with 25 tons/year of NO_x in Utah, Salt Lake, and Davis Counties, and sources with 25 tons/year of SO_x and PM₁₀ in Salt Lake and Utah Counties. For

⁶UTM - The globe is divided into sixty zones, each spanning six degrees of longitude. Each zone has its own central meridian. This prpojection is a specialized application of the Transverse Mercator projection.

⁷Title V - Title V sources include sources with greater than 100 tons/year of NO_x, SO_x, PM₁₀, VOC, CO or 10 tons/year of an individual hazardous air pollutant (HAP) or 25 tons/year of a combination of HAPs or a source that is regulated by a federal regulations..

the episode day inventory modeling, DAQ will utilize all the available data on the sources in the domain. This will help to make the modeling process as accurate and reliable as possible. However, the use of this data in the episode day inventory will not necessitate the specific identification of those sources in the Maintenance Plan, nor will they constitute a "SIP emission limit" nor "SIP Source" nor "SIP cap" in the historic use of the terms.

UDAQ will model point source episode-day specific data if available. This data will replace the annual inventory emissions by unit within SMOKE. If the data is not available, average daily emissions of SO_x, NO_x, PM₁₀, CO, and VOC during the first quarter of the year will be calculated using available quarterly production data and days/week operating data. These average daily emissions will be used along with hours of operation and start and finish times in the model.

Sources with actual emissions of 250 tons/ year (or greater) of PM_{10} , NO_x , or SO_x will be surveyed to determine if any anomalies occurred in their processes during the episode days. This data will be incorporated into the episode modeling.

The inventory submittals of the sources listed in the following table will be quality checked. Any source within the domain that has 1996 actual emissions of 100 tons/year or more of PM_{10} , SO_x , or NO_x will be quality checked. The amounts of PM_{10} and its percursors reported by these point sources in 1996 (prior to detailed checking) are listed. By checking these submittals in detail, over 90 percent of the actual emissions of NO_x , SO_x and PM_{10} from major sources will be checked. However, the quality checking of the data from these sources will not necessitate the specific identification of those sources in the Maintenance Plan, nor will they constitute a "SIP emission limit" nor "SIP Source" nor "SIP cap" in the historic use of the terms.

Table 3
1996 SOURCES CHECKED IN DETAIL
(tons/year)

COMPANY	SITE	PM_{10}	NO _x	SO _x
Alliant Techsystems Incorporated	Bachus Works: Plant 1/NIROP/Graphite Structures	123.47	50.82	0.26
Amoco Petroleum Products	Salt Lake City Refinery	43.95	514.32	982.63
Central Valley Water Reclamation Fac.	Wastewater Treatment Plant		136.65	1.58
Chevron Products Co - SL Refinery	Salt Lake Refinery	38.00	621.20	1115.60
Companion Systems Incorporated	Fiberglass Manufacturing			
Davis County Solid Waste Management	Energy Recovery Facility (DCERF)	5.05	341.85	75.46
DAW Technologies Incorporated	Ultraclean Manufacturing Site	1.50	12.56	0.07
Defense Logistics Agency	Defense Distribution Depot, Ogden (DDOU)	43.67	119.89	34.25
Flying J Incorporated	Flying J Refinery (Big West Oil Co.)	40.57	282.55	573.87
Geneva Rock Products	Point of the Mountain Facility	68.69	136.50	31.48
Geneva Steel	Steel Manufacturing Facility		1941.23	2019.50
Hill Air Force Base	Main Base	169.98	161.63	16.07
Holnam Incorporated	Devil's Slide Plant	601.09	583.95	3.45

IMC Kalium Ogden Corporation	West Desert Operation - Salt & Potash Plants	174.20	116.10	8.22
Inland Refining Incorporated	Petroleum Products Refining	3.38	35.22	37.46
Interstate Brick Company	Brick Manufacturing Plant	170.58	36.36	112.91
Kennecott Barneys Canyon Mining Company	Barney's Canyon Mine	159.20	302.68	5.05
Kennecott Utah Copper Corporation	Smelter, Refinery	403.75	169.89	1555.24
Kennecott Utah Copper Corporation	Mine & Copperton Concentrator	2319.05	2598.39	35.20
Kennecott Utah Copper Corporation	N Concentrator, Power Plt, Lab, Tailings Impoundmnt	225.86	2156.15	2141.42
Magnesium Corporation of America	Rowley Plant	1313.13	780.54	40.89
Pacific States Cast Iron Pipe Company	Pipe Casting Plant	12.30	33.11	3.08
PacifiCorp	Little Mountain Power Plant	37.10	399.12	0.50
Phillips 66 Company	Phillips Refinery	63.43	520.26	864.05
Salt Lake City Airport Authority	Salt Lake City International Airport	18.68	221.61	18.15
Union Pacific Resources Company	Yellow Creek Gas Plant		181.40	
Thiokol Corporation	Promontory Plant	317.93	85.29	20.20
University of Utah	University of Utah facilities	4.70	189.70	6.20
Utelite Corporation	Shale Processing	28.59	146.45	63.25
Vulcraft, Division of Nucor Corporation	Steel Products Manufacturing	18.49	11.72	0.37
	TOTALS	7534.53	12887.14	9766.40

POLLUTANT	EMISSIONS FROM MAJOR SOURCES	EMISSIONS FROM QUALITY CHECKED SOURCES	PERCENTAGE-
PM ₁₀	4558.91	7534.53	165 %
NO _x	8335.3	12887.14	154 %
SO _x	8664.86	9766.40	113 %

The percentages are over 100 percent because most major sources for one pollutant are minor for the others.

During the checking of the sources listed in the above table, any calculations that are based on emission factors in sections of EPA's Compilation of Air Pollutant Emission Factors, AP-42 that have been updated shall be recalculated using the most current emission factors. Due to the large amount of resources required and small impact on the modeling outcome, emission calculations for the remaining point sources that use AP-42 factors shall NOT be updated.

In addition, the sand and gravel sources with operations at the "point of the mountain" and "Beck Street" listed in Table 4 will be quality check for accuracy. However, the quality checking of the data from these sources will not necessitate the specific identification of those sources in the Maintenance Plan, nor will they constitute a "SIP emission limit" nor "SIP Source" nor "SIP cap" in the historic use of the terms.

Table 4 SAND AND GRAVEL SOURCES CHECKED IN DETAIL

Allroc Products

Facon Ridge Construction

Foss Lewis and Sons Construction Inc.

Geneva Rock

Lakeview Rock Products

Monroc

Salt Lake Valley Sand and Gravel

Staker Paving and Construction Company

StarCarbon Incorporated

Emission points (units) within point sources in the domain that significantly impact the modeling analysis will be identified. (THIS HAS NOT YET BEEN DONE) The selection will be made by identifying all emission points that (i.e. emit a certain level of annual emissions; emit \geq 100 tons/winter weekday of PM₁₀ or \geq 250 tons/winter weekday of So_x, NO_x, or VOC or some other level; sources in the hot spot analysis; etc.) This selection will be made using actual emission figures. These emission points *may* be regulated as specifically identified emission points in the SIP similar to the regulations outlined in the current SIP (i.e., everything that goes into the calculations documented in detail and requiring SIP changes when modified). This selection criteria is being made based on the current understanding of the way the model distributes the emissions throughout the gridded area, how the model is meant to be used, and how the data may be used in the future.

The emission points (units) at the point sources that are not specifically identified as significantly impacting the modeling analysis and all other point source data available from the annual 1996 inventory will be included in the data set for the episode modeling process. Using this information in the episode modeling process will NOT necessitate the specific identification of those sources in the Maintenance Plan, nor will they constitute a "SIP emission limit" nor "SIP Source" nor "SIP Cap" in the historic use of the terms. The analysis of this data that was done for the annual inventory NOT included in the above table will NOT be upgraded. It will be assumed that the data is accurate.

Projection year inventory

The sources that contain emission points that significantly impact the modeling analysis will be contacted and asked to identify any production/emission changes between now and 2003 and between 2003 and 2020 or 2030 that would override the growth projections calculated according to the EIIP Volume X for point sources. The growth projections will be calculated for the entire source. However, calculating projections based on the entire source will not necessitate

the specific identification of those entire sources in the Maintenance Plan, nor will they constitute a "SIP emission limit" nor "SIP Source" nor "SIP cap" in the historic use of the terms.

Allowable SO_x , NO_x , and PM_{10} emissions will be researched for point sources which had actual emissions in 1996 of 100 tons/year of SO_x or NO_x , or 70 tons/year or more of PM_{10} . (These are the cutoffs presented in the draft Consolidated Inventory Rule.) If any of these sources have allowable emissions of 250 tons/year or more of SO_x and/or NO_x , or allowable emissions of 100 tons/year or more of PM_{10} , allowable emissions will be included in the projection inventory process. These sources will be contacted to find out if production/emission changes are planned between now and 2003 and between 2003 and 2020 or 2030 that would increase the sources actual emissions, and if so, when those actuals would exceed the present allowables. Based on this information, a determination on how the emissions will be grown for the projections will be made for individual sources and explained in the Technical Support Document of the PM_{10} SIP. The use of this data in the model will not necessitate the specific identification of those sources in the Maintenance Plan, nor will they constitute a "SIP emission limit" nor "SIP Source" nor "SIP cap" in the historic use of the terms.

Major point sources that do not have units that are identified as units that may be regulated will be included in the projection inventory. Their growth will be based on the calculations outline in the EIIP Volume X for point sources. However, the use of this data in the projection inventory will not necessitate the specific identification of these sources in the Maintenance Plan, nor will they constitute a "SIP emission limit" nor "SIP source" nor "SIP Cap" in the historic use of the terms.

Non-major point sources and area source emissions will be projected according to EIIP Volume X area source calculations. The use of these calculations in the model will not necessitate the specific identification of those sources in the Maintenance Plan, nor will they constitute a "SIP emission limit" nor "SIP Source" nor "SIP Cap" in the historic use of the terms.

Several point sources have reduced emissions since the current PM_{10} SIP was put into place. When these reductions were made, the sources created banked emissions which can be used for future expansion. Any banked emissions in the domain will be included in the projection process. These emissions will be modeled throughout the county in the same way area emissions are modeled because they can be used anywhere within the nonattainment area, not just at the source that holds them.

If the model does not show continuing compliance with the NAAQS, further analysis on what controls to initiate in the domain, how to deal with the allowable vs actual buffers, and how to manage banked emissions will be done.

8.1 BIOGENIC EMISSIONS

The emissions from biogenics is calculated by multiplying land area and foliage types by county by PC-BEIS software emission factors. The Geographic Information System (GIS) is used to create a land use data base with a higher degree of spatial resolution than the GEOECOLOGY data base. Since biogenic emissions are at a minimum during PM episodes, they will not be included in the episode or projection inventories.

9 SOIL EMISSIONS

9.1 SOIL DECAY NO_x

 NO_x emissions from soil are believed to be negligible during winter episodes in which the temperatures are low. The NO_x from soils will not be included in the modeling process.

9.2 UNPAVED FARM ROAD DUST (from vehicle travel)

Calculation of Annual Emissions

The Utah Department Of Agriculture publishes annual acreage of harvested cropland by county. This information, combined with some basic assumptions about the frequency and nature of farm road gridding, will be combined with AP42 emission factors (for PM only) to estimate fugitive dust emissions within the domain area.

Calculation of episode-emission day and projection emissions

Since unpaved farm travel is very low in winter and these roads are snowcovered during the episode, UDAQ has determined that emissions from this category are zero or virtually zero. For this reason, no calculations are made.

9.3 UNPAVED NON-FARM ROAD DUST

Calculation of Annual Emissions

Roads, paved or unpaved, grid virtually all lands within the domain area. Total domain land area within the domain, combined with some basic assumptions that apply to the California's Central Valley, will be combined with AP42 emission factors (for PM only) to estimate fugitive dust emissions on unpaved non-farm roads within our study area.

Calculation of episode-emission day and projection emissions

Since unpaved non-farm travel is very low in winter and these roads are snowcovered during the episode, UDAQ has determined that emissions from this category are zero or virtually zero. For this reason, no calculations are made.

9.4 WINDBLOWN UNPAVED ROAD DUST

Calculation of Annual Emissions

Section 9.3 (above) will estimate fugitive dust from vehicle travel on unpaved roads. Given the same road network, this section (9.4) will estimate fugitive dust stirred by wind using standard AP42 factors applicable to our area.

Calculation of episode-emission day

Historically, snow cover and no wind are associated with typical PM_{10} episode days. Therefore, fugitive emissions from this category for episode and projection days is considered to be negligible.

Calculation of projection emissions

This category will not be included in the projection calculations.

9.5 ROAD CONSTRUCTION DUST

Calculation of Annual Emissions

Each year, the Utah Department Of Transportation counts (or estimates) the number of roadway lane miles within each county under their management. Annual changes will be assumed to indicate road segments constructed during the previous 12 months. Combined this information with AP42 factors will provide an estimate of fugitive dust from road construction.

Calculation of episode-emission day

Historically, snow cover and no wind are associated with typical PM_{10} episode days. Therefore, fugitive emissions from this category for episode and projection days is considered to be negligible.

Calculation of projection emissions

This category will not be included in the projection calculations.

9.6 AGRICULTURAL LAND PREPARATION DUST

Calculation of Annual Emissions

The Utah Department Of Agriculture publishes annual acreage of harvested cropland by county. This information, combined with some basic assumptions about farming practices, will be combined with AP42 emission factors (for PM only) to estimate fugitive dust emissions within the domain area.

Calculation of episode-emission day

Historically, snow cover and no wind are associated with typical PM_{10} episode days. Therefore, fugitive emissions from this category for episode and projection days is considered to be negligible.

Calculation of projection emissions

This category will not be included in the projection calculations.

9.7 AGRICULTURAL CROP HARVEST DUST

Calculation of Annual Emissions

The Utah Department Of Agriculture publishes annual acreage of harvested cropland by county. This information, combined with some basic assumptions about farming practices, will be combined with AP42 emission factors (for PM only) to estimate fugitive dust emissions within the domain area.

Calculation of episode-emission day

Historically, snow cover and no wind are associated with typical PM_{10} episode days. Therefore, fugitive emissions from this category for episode and projeciton days is considered to be negigible.

Calculation of projection emissions

This category will not be included in the projection calculations.

9.8 LIVESTOCK OPEN GRAZING AND FEEDLOTS

Calculation of Annual Emissions

The Utah Department Of Agriculture publishes annual head of cattle, sheep, and other grazing and feedlot animals by county. This information, combined with some basic assumptions about livestock feeding practices, will be combined with AP42 emission factors to estimate fugitive dust emissions from their activity within the domain area.

Calculation of episode-emission day

Historically, snow cover and no wind are associated with typical PM_{10} episode days. Therefore, fugitive emissions from open grazing is assumed to be zero for episode and projection days. Fugitive emissions from feedlots is considered to be negligible.

Calculation of projection emissions

This category will not be included in the projection calculations.

9.9 BUILDING CONSTRUCTION DUST

Calculation of Annual Emissions

AP42 emission factors will be combined with estimates of construction activity in each county of the domain to calculate fugitive dust stirred up from (1) the construction wheel and track movement, and (2) wind blowing over exposed soils on construction sites.

Calculation of episode-emission day

Historically, snow cover and no wind are associated with typical PM_{10} episode days. Therefore, fugitive emissions from this category for episode and projection days is considered to be negligible.

Calculation of projection emissions

This category will not be included in the projection calculations.

10. AMMONIA EMISSIONS DATA

10.1 LIVESTOCK AMMONIA

The ammonia emissions from livestock will be estimated by multiplying the number of each type of animal by each applicable emission factor. Per-animal emission factors are supplied in "Development And Selection Of Ammonia Emission Factors", an August 1994 publication, written by R. Battye and his colleagues (hereafter Battye). When Battye's publication is silent for a specific animal type, an emission factor from one of several other secondary sources will supply the factors.

The annual publication, "Utah Agricultural Statistics And Utah Department Of Agriculture And Food Annual Report", will supply the number of domestic livestock animals by county and type. Company-prepared information, supplied through individual Internet sites, will be searched to fill known gaps in livestock numbers that may be missing from any of the above reports.

10.2 DOMESTIC ANIMAL AMMONIA

The ammonia emissions from domestic animals, namely dogs and cats, will be estimated using emission factors from the Battye report multiplied by animal-ownership statistics for households inside the domain. Episode and typical winter season day emissions will be calculated from annual emissions using SMOKE software.

10.3 WILD ANIMAL AMMONIA

The ammonia emissions from wild animals, (such as deer, elk, bear, and rabbits), will be estimated using emission factors

from the Battye report (Table 6-1, page 6-3) multiplied by animals estimated by the Utah Department Of Natural Resources (DNR) by county. Spatial and temporal allocations will track with DNR recommendations. Ammonia from the ubiquitous and quickly-degraded droppings of birds and rodents are included in soil ammonia, below.

10.4 SOIL AMMONIA

Meteorological conditions during an episode day suggest snowcover with average temperatures in the high 30s and low 40s. Since ammonia is water-soluable, soil chemistry suggests that escaping soil ammonia will likely be encapsulated by this wet snow. For these reasons, no air-borne ammonia is presumed to be released during a typical episode day.

10.5 HUMAN PERSPIRATION, RESPIRATION AMMONIA

The ammonia emissions from human perspiration and respiration, (0.55 and 0.0035 lbs per person annually), will be estimated using emission factors from the Battye report multiplied by the population of each county inside the domain. Episode and typical winter season day emissions will be calculated from annual emissions using SMOKE software.

10.6 HOUSEHOLD CLEANING AMMONIA

The ammonia emissions from household cleaning products, (0.05 lbs per person annually), will be estimated using emission factors from the aforementioned Battye report multiplied by the population of each county inside the domain. Episode and typical winter season day emissions will be calculated from annual emissions using SMOKE software.

10.7 STATIONARY COMBUSTION AMMONIA

The ammonia from the combustion of natural gas, residual oil, an digester gas will be estimated using emission factors from Table 9-3 of "Review Of Current Methodologies For Estimating Ammonia Emissions" (RCMA), written/compiled by Sonoma Technology Inc. Those factors will be combined with energy estimates reported by established fuel agencies. Episode and typical winter season day emissions will be calculated from annual emissions using SMOKE software.

10.8 INDUSTRIAL POINT AMMONIA

Emissions of primary (by ammonia slip) and secondary (created by reaction) ammonia released from established point sources will be estimated using emission factors from Table 9-4 (page 9-13) of the RCMA document. Those factors will be combined with details contained in the Toxic Release Inventory and 1997 and 1998 ammonia data about specific point sources that are identified in the domain. Episode and typical winter season day emissions will be calculated from annual emissions using SMOKE software.

10.9 PUBLICLY-OWNED TREATMENT WORKS (POTW) AMMONIA AND AMMONIA FROM RELATED WASTES

In the "1997 Gridded Ammonia Emission Inventory Update For The South Coast Air Basin" (GASCAB), a factor of 0.118 lbs of ammonia released per million gallons of effluent was utilized for all 32 treatment plants included in that inventory. Presuming constant conditions in Utah, this same factor will be multiplied by the effluent of each POTW inside our study domain. Episode and typical winter season day emissions will be calculated from annual emissions using SMOKE software.

Furthermore, some biological wastes never enter the POTW system but still emit ammonia that should be estimated. This includes ammonia from disposal and reusable baby diapers, and rural or remote outhouses or improvisation. UDAQ accepted and followed the calculation method reported in "Development of the Ammonia Emission Inventory for the Southern California Air Quality Study", Appendix G.

10.10 MUNICIPAL LANDFILLS AMMONIA

Ammonia emissions are indexed to methane in the GASCAB document (section 10.2) at the rate of 0.007 lbs ammonia per lb of methane, and the EPA's Landfill software model estimates methane. Episode and typical winter season day emissions will be calculated from annual emissions using SMOKE software.

10.11 ON-ROAD MOBILE SOURCES AMMONIA

Ammonia emissions are indexed to nitrogen oxide emissions from light-duty gasoline vehicles calculated in the latest edition of the MOBILE software model. According to several separate researchers discussed in the scope study (STI-900031-1965-DSS), general agreement led to a ratio of ammonia-to-NO_x of 1:10. UDAQ will use this ratio and the MOBILE model to calculate ammonia emissions from on-road mobile in the domain.

11. QUALITY CHECKING AND QUALITY ASSURANCE

The 1996 inventory has under gone quality assurance and quality control during the review process for the periodic ozone and CO inventories and the statewide EPA required inventory. Ten percent of the major sources in Utah attainment areas have been checked in detail for all criteria pollutants. UDAQ will quality check the point sources listed in Section 7, Point Source Emission Data.

12. FUTURE ACTIONS

The 1996 annual area inventory will be recalculated using the above estimation methods. The winter season and episode day will be calculated based on the modified figures.